

000530

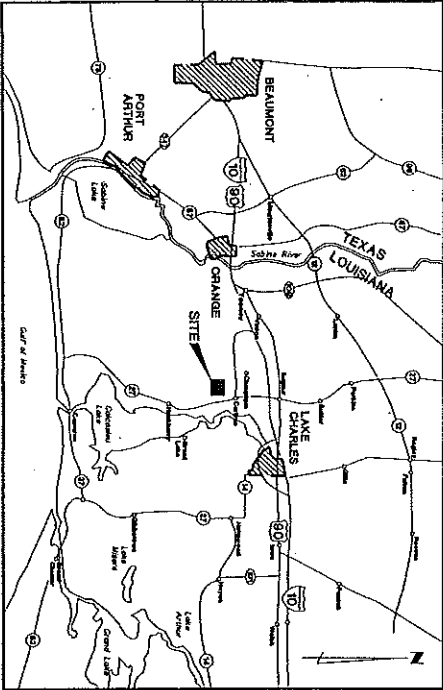
# **ATTACHMENT 11**

## **APPROVED DESIGN DRAWINGS FOR CELLS 6 AND 7**



Chemical Waste Management, Inc.  
Lake Charles Facility  
Lake Charles, Louisiana

000591



SITE LOCATION MAP

FIGURE NO.	TITLE	DRAWING NO.
1.	COVER SHEET	785
2.	SITE LAYOUT PLAN	786
3.	LANDFILL DEVELOPMENT PLAN	787
4.	FINAL COVER GRADES PLAN	788
5.	FINAL COVER CROSS SECTIONS	789
6.	COVER AND LINER SYSTEM DETAILS	790
7.	SURFACE WATER CONTROL DETAILS	791
8.	DOWNSLOPE CHANNEL DETAILS	792



Plans Prepared by:

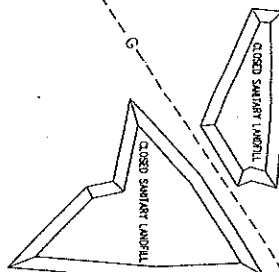
**Golder Associates**  
Houston, Texas

NOVEMBER 1995

933-4177



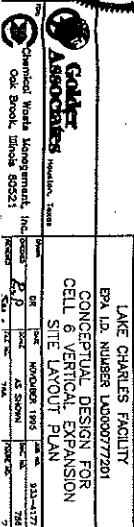
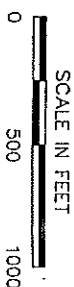
**CONCEPTUAL DESIGN FOR  
CELL 6 VERTICAL EXPANSION  
EPA I.D. NUMBER: LAD000777201**



LEGEND

-----G-----	HIGH PRESSURE GAS PIPE UNB
-----P-----	PROPERTY LINE
-----	SLURRY TRENCH

1. ALL ELEVATIONS ARE IN FEET RELATIVE TO MEAN SEA LEVEL.
2. THIS PLAN IS CONCEPTUAL IN NATURE. THE ACTUAL CONSTRUCTION LOCATIONS, ELEVATIONS AND DETAILS MAY VARY FROM THOSE SHOWN. OBTAINED DRAWINGS WILL BE DEVELOPED PRIOR TO CONSTRUCTION.
3. COORDINATES TAKE PRECEDENCE OVER GRADING SCALE.
4. THE SLOBBY TRENCH IS SHOWN ALONG FPOD COORDINATES (N 6856, N 7412, N 6822, N 9920, N 6857, N 9919, N 6310, N 9930, N 6831, N 7392).
5. THE SLOBBY TRENCH IS SHOWN ALONG FPOD COORDINATES (N 6866, N 605, N 7345, 2820), (N 6014, 4858, N 7335, 2821), (N 6665, 055, 4858, N 6939, 126), (N 10,000, 375), (N 10,000, 472), (N 12,341, 634), (N 6025, 485, N 11,354, 705).



**LEGEND**

---G--- HIGH PRESSURE GAS PIPE LINE

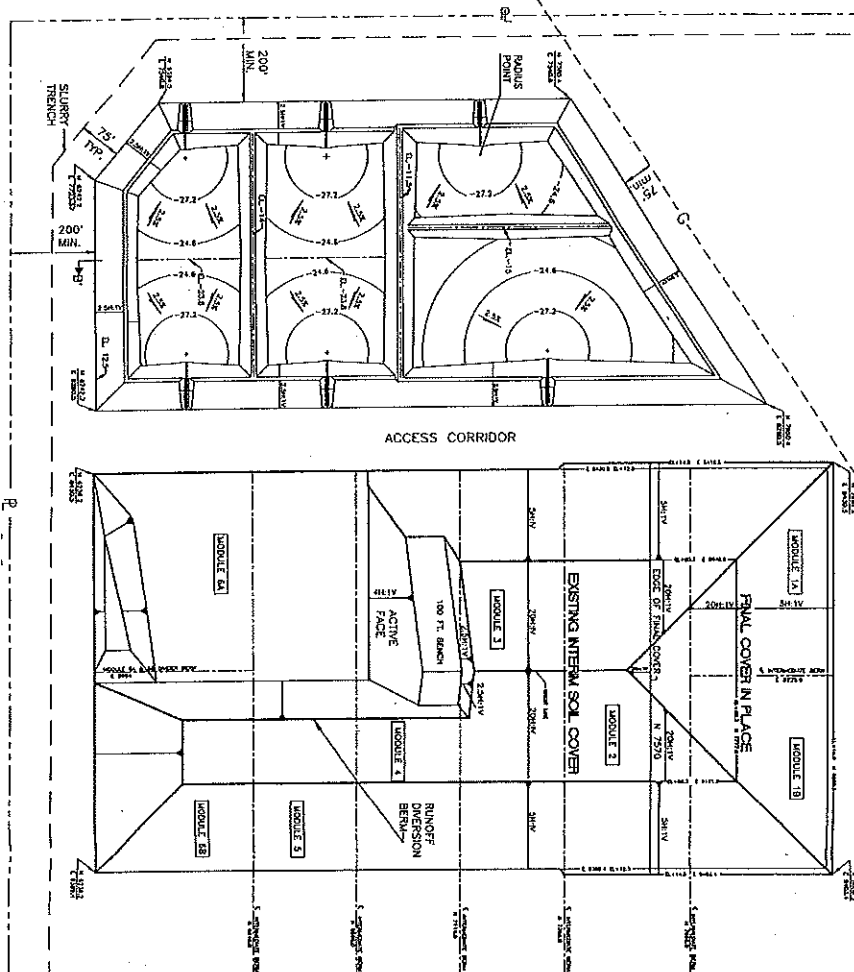
---R--- PROPERTY LINE

---S--- SLURRY TRENCH

\* RADIUS POINTS (CELL 7)

--- MODULE BOUNDARY

1. THIS PLAN IS CONCEPTUAL IN NATURE. THE ACTUAL CONSTRUCTION, LOCATIONS, ELEVATIONS, AND DETAILS MAY VARY FROM THOSE SHOWN. DETAILED DRAWINGS WILL BE DEVELOPED PRIOR TO CONSTRUCTION.
2. COORDINATES HAVE PRECEDENCE OVER DRAWING SCALE.
3. ALL ELEVATIONS ARE IN FEET RELATIVE TO MEAN SEA LEVEL.
4. CELLS 8 IS IN USE. LINES AND ELEVATIONS SHOWN FOR CELL 8 ARE INDICATING OF CONFINING IN FALL 1985.
5. CELL 7 IS BEING EXCAVATED. ELEVATIONS AND CONTOURS SHOWN IN CELL 7 ARE APPROXIMATE DESIGN PROPOSED. RIGIDUS POINTS ARE AT EL. -28.65.
6. THE SLURRY TRENCH IS CONSTRUCTED FROM COORDINATES (IN 8132), E 8640, (IN 6140, 2 7589), AND (IN 8631, 7 7382).
7. THE PROPERTY LINE IS CONSTRUCTED FROM COORDINATES (IN 6225,7527 E 10095,3258), (IN 8641,486), E 7535,241), AND (IN 8686,026, E 7542,273).




CELL 7 (FUTURE)

CELL 6



SCALE IN FEET





**Golden Associates**  
Houston, Texas

**CONCEPTUAL DESIGN FOR  
CELL 6 VERTICAL EXPANSION  
LANDFILL DEVELOPMENT PLAN**

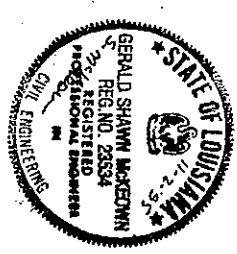
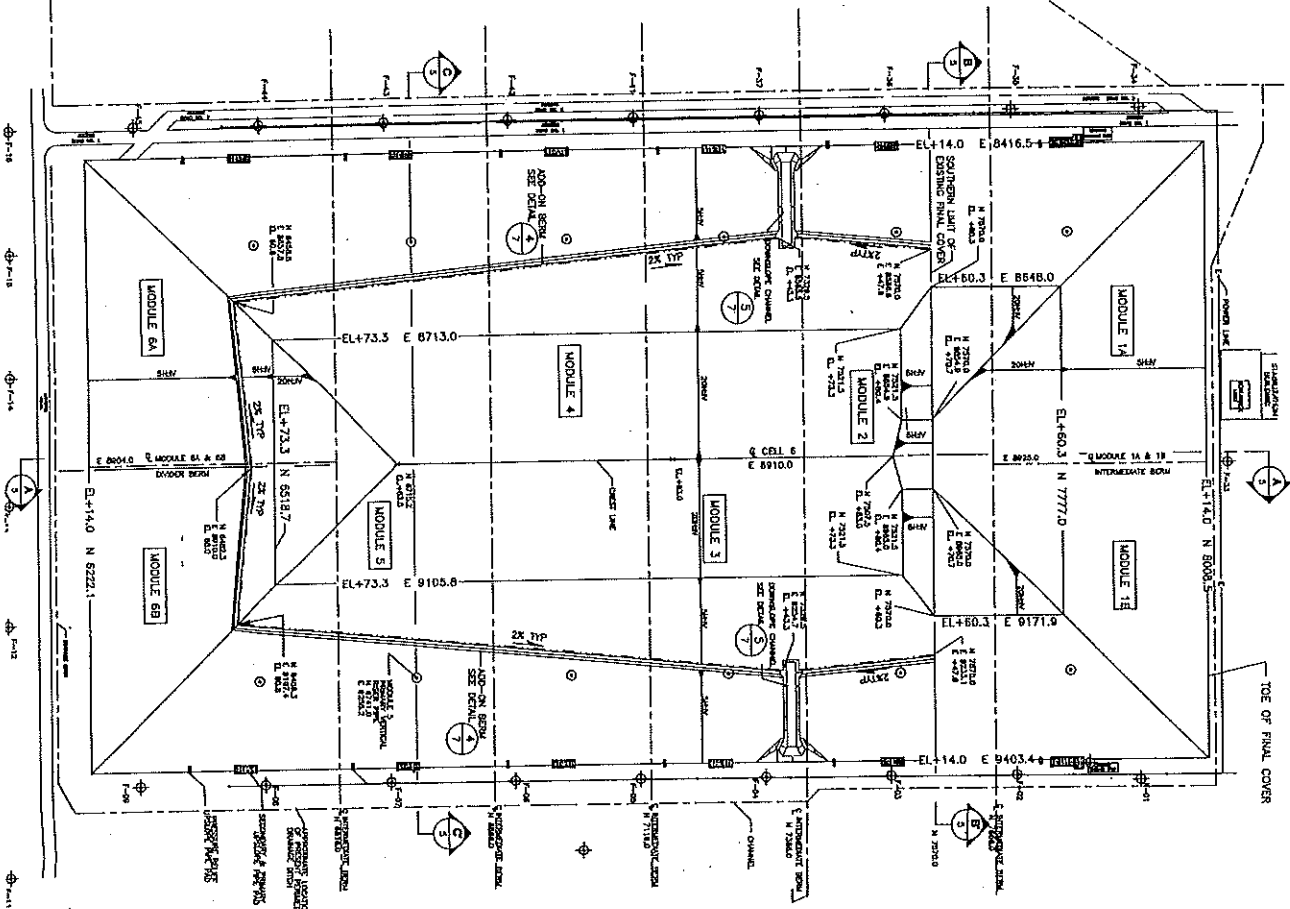
Chemical Waste Management, Inc.  
Oak Brook, Illinois 60521

SHEET	DATE	REV	NOVEMBER 1985	BY	JSS-4177
DESIGN	2/2	10/1	AS SHOWN	CHKD	782
PROJECT					

Lake Charles Facility  
EPA I.D. Number LAD00077720

CONCEPTUAL DESIGN FOR  
CELL 6 VERTICAL EXPANSION  
LANDFILL DEVELOPMENT PLAN

ORDERED	DATE	787
20	AS SHOWN	
TOTAL		



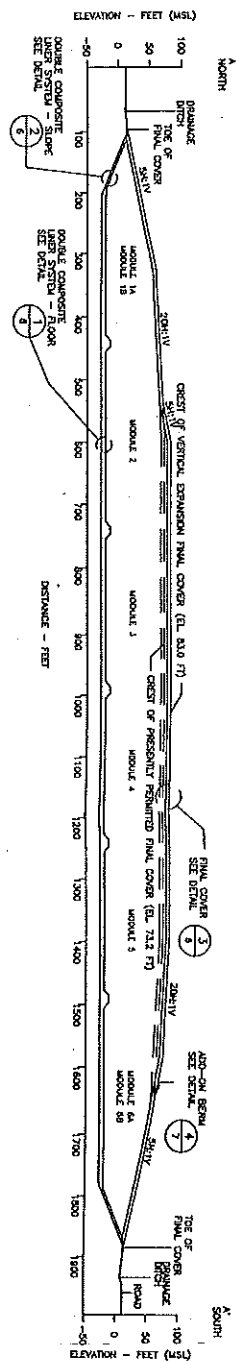
**GOLDER ASSOCIATES**  
 Chemical Waste Management, Inc.  
 Oak Brook, Illinois 60151

LAKE CHARLES FACILITY  
 EPA ID NUMBER LA000077201  
 CONCEPTUAL DESIGN FOR  
 CELL 6 VERTICAL EXPANSION  
 FINAL COVER GRADES PLAN

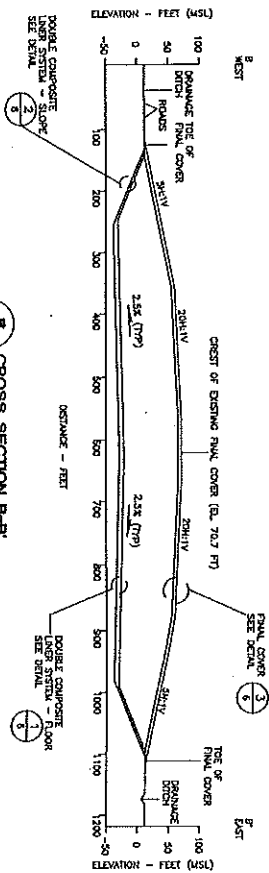
- NOTES**
- THIS PLAN IS CONCEPTUAL IN NATURE. THE ACTUAL CONSTRUCTION LOCATIONS, ELEVATIONS, AND DETAILS MAY VARY FROM THOSE SHOWN. DETAILED DRAWINGS WILL BE DEVELOPED PRIOR TO CONSTRUCTION.
  - COORDINATES HAVE PRECEDENCE OVER DIMENSIONAL SCALE.
  - ALL ELEVATIONS ARE IN FEET RELATIVE TO MEAN SEA LEVEL.
  - THE ELEVATIONS SHOWN REPRESENT THE UPPERMOST SURFACE OF THE FINAL COVER VEGEMENT GROWN UPON.
  - THE TOP 3 FEET OF WASTE SHALL CONSIST OF SELECT MATERIAL, FREE OF DRAKE TRANSPORTERS, ETC. TO LANDFILL SETTLEMENT OF THE FINAL COVER DUE TO VIBES IN THE WASTE.

- LEGEND**
- MONITORING WELL
  - POWER TRANSMITTER
  - POWER PILES/LINES
  - AD-ON BERM FLOWLINE
  - DESIGNATED POINT
  - UPPERMOST FREE SURFACE
  - PERMANENT VERTICAL SCALE MARK

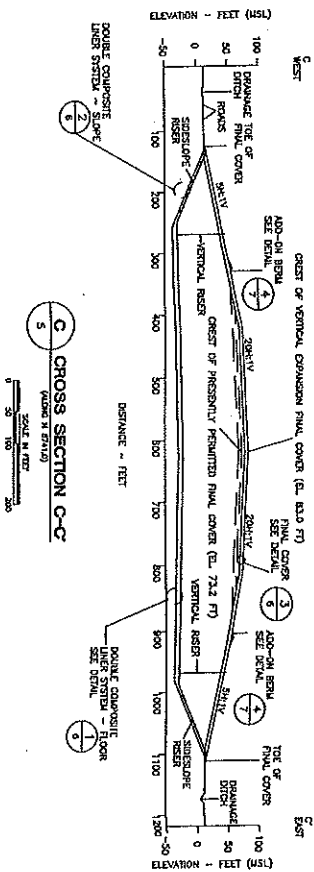
000594



**A**  
CROSS SECTION A-A  
(SCALE IN FEET)



**B**  
CROSS SECTION B-B  
(SCALE IN FEET)



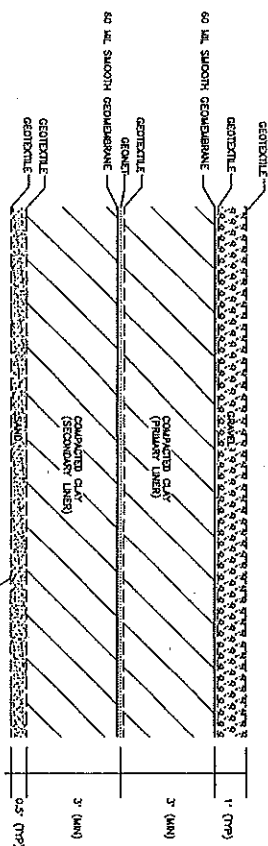
**C**  
CROSS SECTION C-C  
(SCALE IN FEET)

- NOTES**
1. THE PLAN IS CONCEPTUAL IN NATURE. THE ACTUAL CONSTRUCTION, LOCATION, ELEVATIONS, AND DRAINAGE WILL BE DETERMINED PRIOR TO CONSTRUCTION OF THE WORKS.
  2. COORDINATES HAVE BEEN OBTAINED FROM THE LATEST AVAILABLE DATA.
  3. ALL ELEVATIONS ARE IN FEET RELATIVE TO MEAN SEA LEVEL.

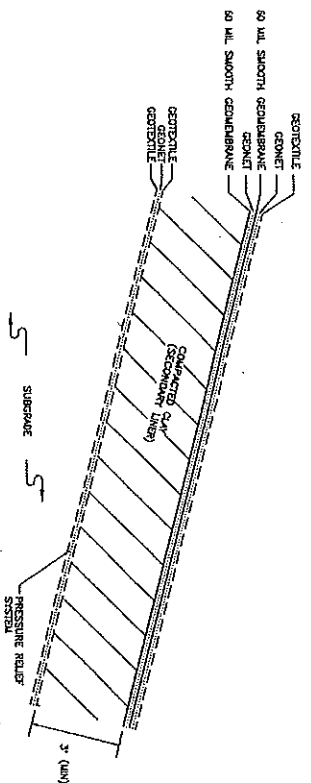


<b>Golder Associates</b> Chemical Waste Management, Inc. 10000 Westchase Drive Houston, Texas 77036 Phone: 281-411-7700 Fax: 281-411-7701	LAKELAND FACILITY EPA ID NUMBER: LA0000777201	
	CONCEPTUAL DESIGN FOR CELL COVER EXPANSION FINAL COVER CROSS SECTIONS	
Project No.: 25 Date: NOVEMBER 1993 Drawn By: JSM Scale: AS SHOWN	Project No.: 25 Date: NOVEMBER 1993 Drawn By: JSM Scale: AS SHOWN	

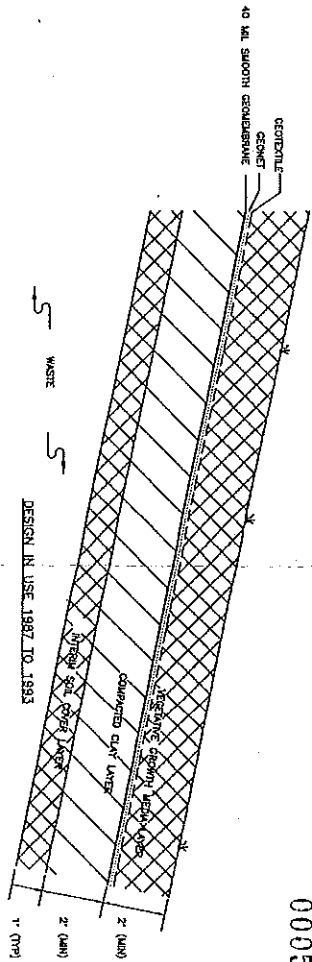
000595



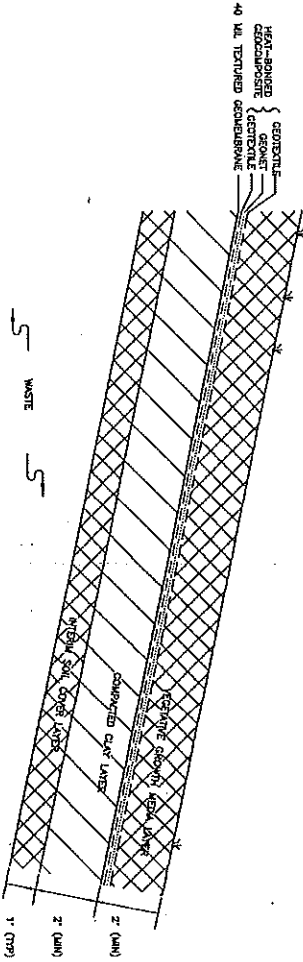
1 DOUBLE COMPOSITE LINER SYSTEM - FLOOR  
NOT TO SCALE



2 DOUBLE COMPOSITE LINER SYSTEM - SLOPE  
NOT TO SCALE



DESIGN IN USE 1987 TO 1993



DESIGN IN USE 1993 TO PRESENT

3 FINAL COVER DETAILS  
NOT TO SCALE

- NOTES
1. ALL ELEVATIONS ARE IN FEET RELATIVE TO MEAN SEA LEVEL.
  2. THIS PLAN IS CONCEPTUAL IN NATURE. THE ACTUAL CONSTRUCTION SHALL BE DETERMINED BY THE FIELD SUPERVISOR.
  3. COORDINATES HAVE BEEN PROVIDED OVER BRASS SCALE.

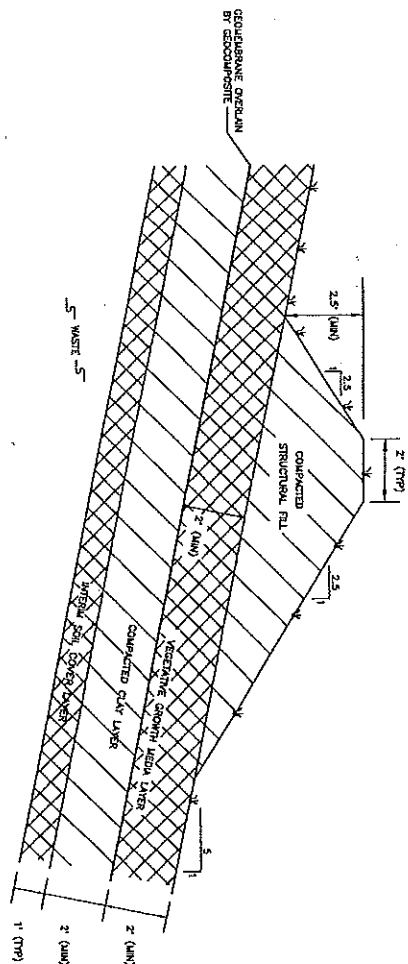


**GAFFER ASSOCIATES**  
 1000 West 10th Street, Suite 100  
 New Orleans, LA 70113  
 Phone: (504) 581-1170  
 Fax: (504) 581-1171  
 Website: www.gaffer.com

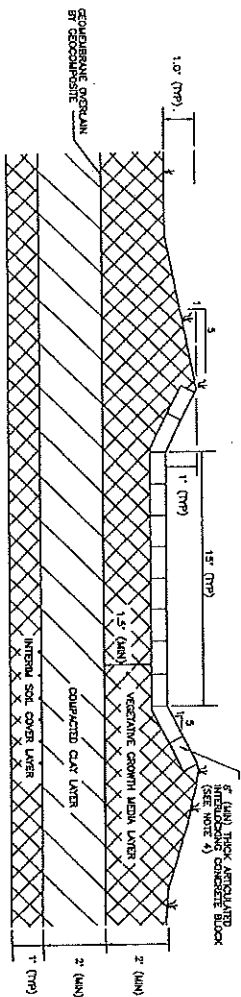
**LAKE CHARLES FACILITY**  
 EPA ID: NUMBER LA000077201  
 CONCEPTUAL DESIGN FOR  
 CELL 6 VERTICAL EXPANSION  
 COVER AND LINER SYSTEM DETAILS

DATE: 11/11/11  
 BY: [Signature]  
 CHECKED: [Signature]  
 APPROVED: [Signature]

000596



4 ADD-ON BERM - CROSS SECTION  
NOT TO SCALE



5 DOWNSLOPE CHANNEL - CROSS SECTION  
NOT TO SCALE

# NOTES

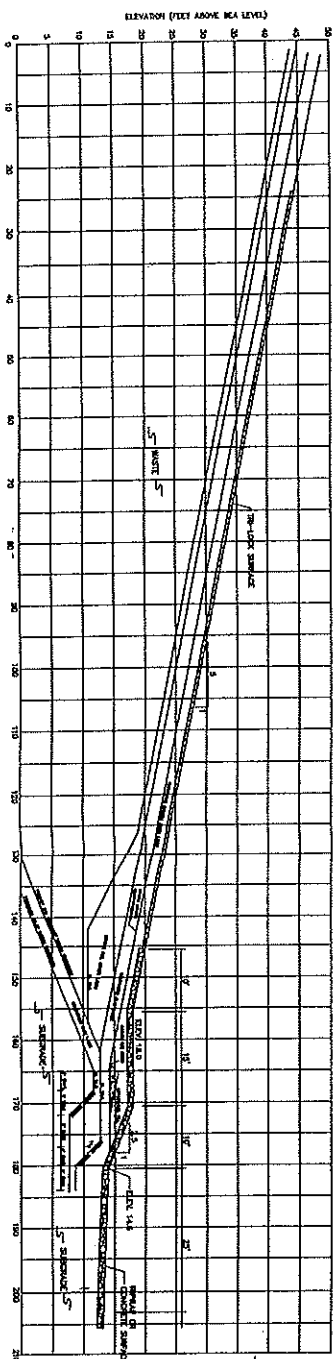
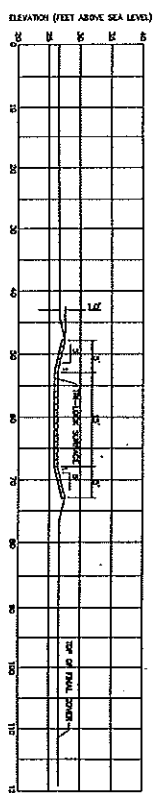
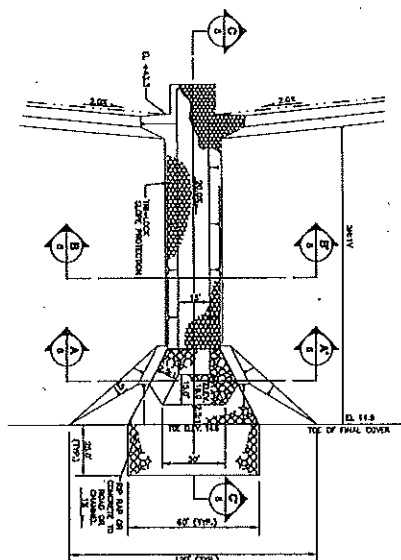
1. ALL ELEVATIONS ARE IN FEET RELATIVE TO MEAN SEA LEVEL.
2. THE DESIGN IS BASED ON THE ASSUMPTION THAT THE ACTUAL CONSTRUCTION DETAILS WILL BE DEVELOPED PRIOR TO CONSTRUCTION.
3. CONSTRUCTORS TAKE PRECEDENCE OVER DRAWING SCALE.
4. THE INTERLOCKING APPROVED CONCRETE BLOCKS ARE TO BE MANUFACTURED BY THE LOCK OR SHOWN APPROVED BLOCK. THE BLOCKS SHALL BE PLACED OVER A SUBGRADE APPROVED BY THE MANUFACTURER.



<b>GOLDER ASSOCIATES</b> 1000 West Main Street Suite 200 Oak Brook, Illinois 60051		LAKE CHARLES FACILITY EPA ID NUMBER LA0000772201 CONCEPTUAL DESIGN FOR CELL 6 VERTICAL EXPANSION SURFACE WATER CONTROL DETAILS	
Date: 10/17/2013 Drawn by: [Signature] Checked by: [Signature] Scale: 3/4" = 1'-0"	Date: 10/17/2013 Drawn by: [Signature] Checked by: [Signature] Scale: 3/4" = 1'-0"	Date: 10/17/2013 Drawn by: [Signature] Checked by: [Signature] Scale: 3/4" = 1'-0"	Date: 10/17/2013 Drawn by: [Signature] Checked by: [Signature] Scale: 3/4" = 1'-0"

000597



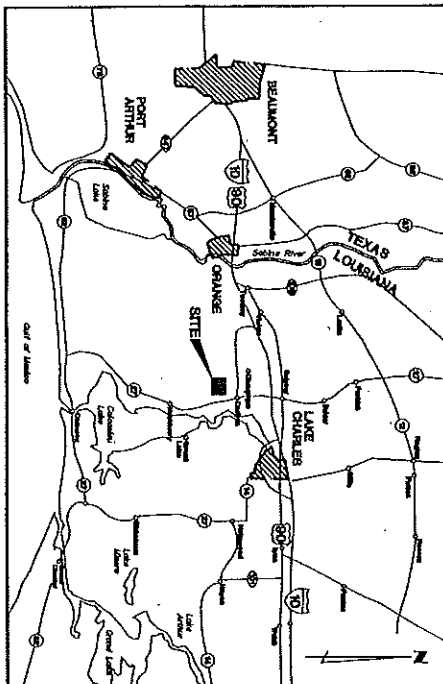
[illegible]

000598



Chemical Waste Management, Inc.  
Lake Charles Facility  
Lake Charles, Louisiana

000593



SITE LOCATION MAP



Golder  
Associates  
Houston, Texas

Plan Prepared by

JANUARY 1995

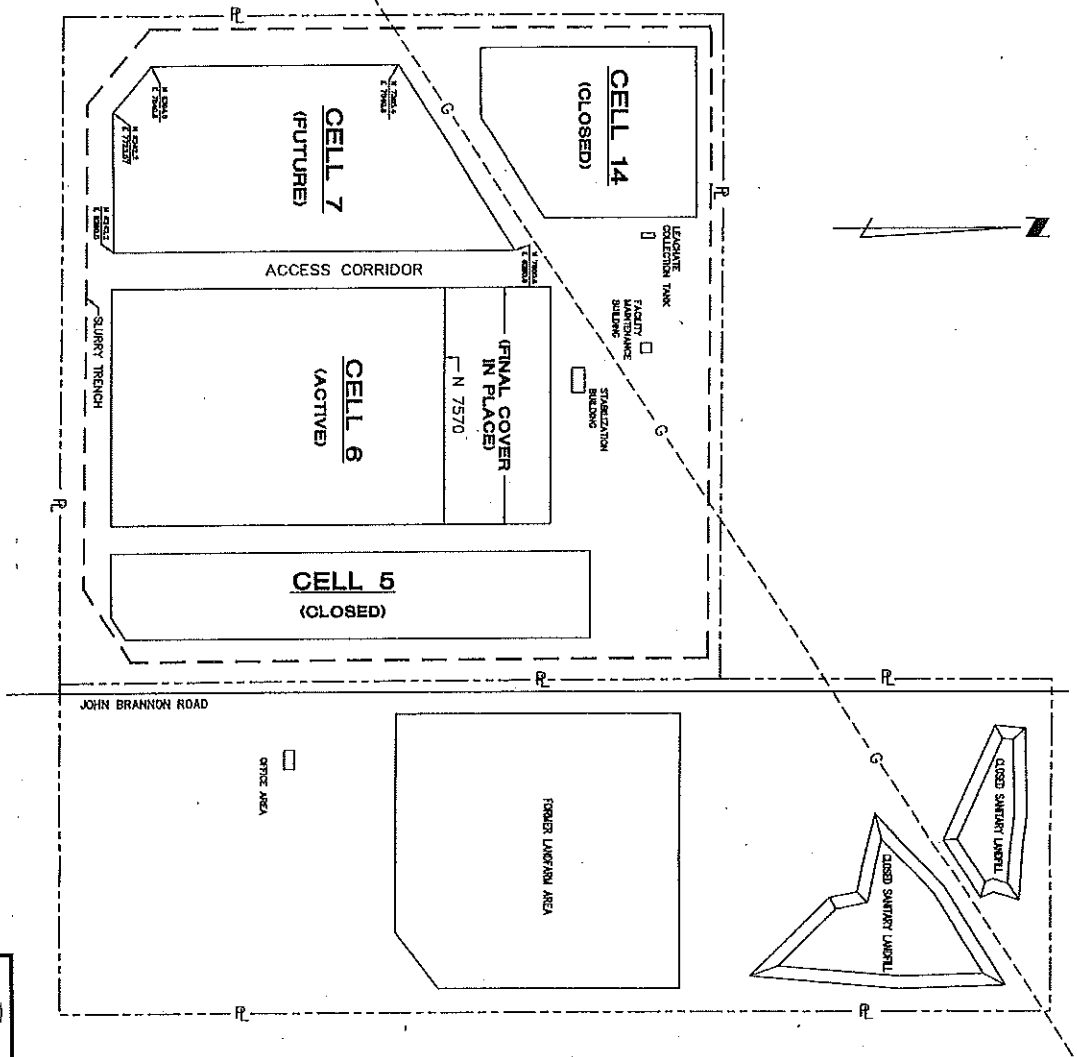
833-4177

FIGURE NO.	TITLE	DRAWING NO.
1.	COVER SHEET	715
2.	SITE LAYOUT PLAN	716
3.	LANDFILL DEVELOPMENT PLAN	717
4.	FINAL COVER GRADING PLAN	718
5.	LANDFILL DEVELOPMENT AND FINAL COVER CROSS SECTIONS	719
6.	EXCAVATION PLAN	720
7.	PRESSURE RELIEF SYSTEM	721
8.	SECONDARY CONTAINMENT AND COLLECTION SYSTEMS	722
9.	PRIMARY CONTAINMENT SYSTEM	723
10.	PRIMARY COLLECTION SYSTEM	724
11.	PRIMARY COLLECTION SYSTEM DETAILS	725
12.	OPERATIONAL LAYER OF SOIL OR SELECT WASTE	726
13.	NORTH/SOUTH DIVIDER BERM SECTIONS I	727
14.	NORTH/SOUTH DIVIDER BERM SECTIONS II	728
15.	NORTH/SOUTH DIVIDER BERM SECTIONS III	729
16.	INTERMEDIATE BERM SECTIONS	730
17.	SURFACE OF WASTE	731
18.	INTERIM SOIL COVER	732
19.	COMPOSITE COVER SYSTEM AND SYNTHETIC DRAINAGE LAYER	733
20.	VEGETATIVE GROWTH MEDIA LAYER	734
21.	INTERMEDIATE BERM PROVISION FOR FUTURE TIE-IN	735
22.	TYPICAL CONSTRUCTION ACCESS RAMP	736
23.	WASTE TRANSPORTER ACCESS RAMP	737
24.	TYPICAL OPERATIONAL SEQUENCES 1 AND 2	738
25.	TYPICAL OPERATIONAL SEQUENCES 3 AND 4	739
26.	TYPICAL OPERATIONAL SEQUENCES 5 THROUGH 7	740
27.	TYPICAL OPERATIONAL SEQUENCES 8 THROUGH 10	741

All information contained herein and attached hereto is considered proprietary and confidential and is not to be displayed, copied or published in whole or in part without prior written consent from CHEMICAL WASTE MANAGEMENT, INC.

CELL 7 CONCEPTUAL  
DESIGN DRAWINGS  
EPA I.D. NUMBER: LAD000777201

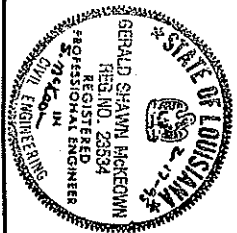
000600



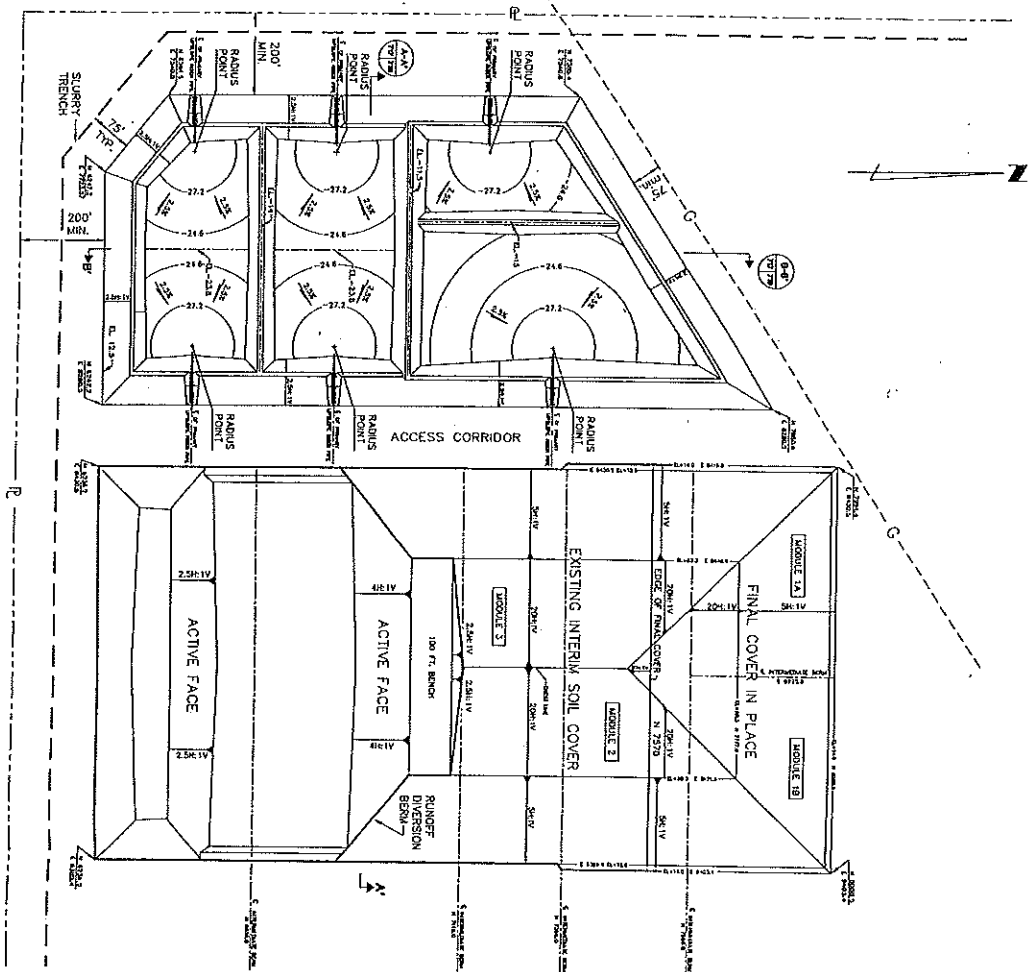
- LEGEND:
- G — HIGH PRESSURE GAS PIPE LINE
  - R — PROPERTY LINE
  - SLURRY TRENCH

NOTES:

1. ALL ELEVATIONS ARE IN FEET RELATIVE TO MEAN SEA LEVEL.
2. THIS PLAN IS CONCEPTUAL IN NATURE. THE ACTUAL CONSTRUCTION LOCATIONS, ELEVATIONS AND DETAILS MAY VARY FROM THOSE SHOWN. DETAILED DRAWINGS WILL BE DEVELOPED PRIOR TO CONSTRUCTION.
3. COORDINATES TAKE PRECEDENCE OVER DRAWING SCALE.
4. THE SLURRY TRENCH IS CONSTRUCTED FROM COORDINATES (N 8636, E 7412), (N 8626, E 9920), (N 8697, E 9919), (N 8310, E 9950), (N 8125, E 9840), (N 8140, E 7590), (N 6390, E 7390), AND (N 8631, E 7382).
5. THE PROPERTY LINES ARE CONSTRUCTED FROM COORDINATES (N 8636, E 7412), (N 8626, E 9920), (N 8697, E 9919), (N 8310, E 9950), (N 8125, E 9840), (N 8140, E 7590), (N 6390, E 7390), AND (N 8631, E 7382).



<b>Golder Associates</b> Houston, Texas Chemical Waste Management, Inc. Oak Brook, Illinois 60061		<b>CELL 7</b> SITE LAYOUT PLAN	
PROJECT LAKE CHARLES FACILITY EPA I.D. NUMBER: LAD000777201	DRAWN: <i>dhg</i> DATE: JANUARY 1995 JOB NO.: 933-4177 CHECKED: <i>RP</i> SCALE: AS SHOWN DTC NO.: 716 REVISION: <i>SW</i> FILE NO.: 853-3197 PLOT NO.: 2		



LEGEND:  
 --- G --- HIGH PRESSURE GAS PIPE LINE  
 --- R --- PROPERTY LINE  
 --- S --- SLURRY TRENCH

SCALE IN FEET  
 0 300 600

CELL 7

CELL 6

**Golder Associates**  
 Houston, Texas  
 Chemical Waste Management, Inc.  
 Oak Brook, Illinois 60521

DATE	BY	DATE	BY
DESIGNED	20	DATE	BY
CHECKED	20	DATE	BY
REVIEWED	20	DATE	BY

PROJECT: LAKE CHARLES FACILITY  
 EPA I.D. NUMBER LA0000777201



**NOTES:**

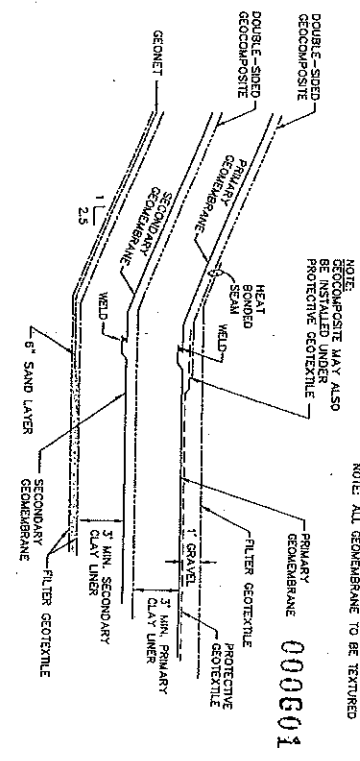
1. THIS PLAN IS CONCEPTUAL IN NATURE. THE ACTUAL CONSTRUCTION LOCATIONS, ELEVATIONS, AND DETAILS MAY VARY FROM THOSE SHOWN. DETAILED DRAWINGS WILL BE DEVELOPED PRIOR TO CONSTRUCTION.
2. COORDINATES TAKE PRECEDENCE OVER DRAWING SCALE.
3. ALL ELEVATIONS ARE IN FEET RELATIVE TO MEAN SEA LEVEL.
4. LINES AND ELEVATIONS SHOWN ON THIS SHEET ARE TAKEN AT THE TOP OF THE LANDFILL DEVELOPMENT PLAN.
5. RADIUS CONTROL POINTS ON THIS SHEET ARE AT EL. -29.65.
6. ELEVATIONS AND COORDINATES SHOWN ON FLOOR ARE APPROXIMATE.
7. THE SLURRY TRENCH IS CONSTRUCTED FROM COORDINATES (N 625, E 964.0), (N 614.0, E 769.0), AND (N 623.0, E 739.2).
8. THE PROPERTY LINE IS CONSTRUCTED FROM COORDINATES (N 603.7, E 1009.3), (N 604.3, E 733.2), AND (N 603.0, E 736.2).

STANDARD LIST OF SYMBOLS FOR GEOSYNTHETICS

GEONET	TEXTURED GEOMEMBRANE
PROTECTIVE GEOTEXTILE	SACRIFICIAL GEOTEXTILE
DOUBLE SIDED GEOMEMBRANE	

**TYPICAL MODULE FLOOR SCHEMATIC**

NOT TO SCALE

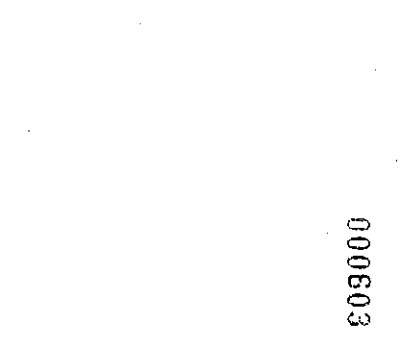
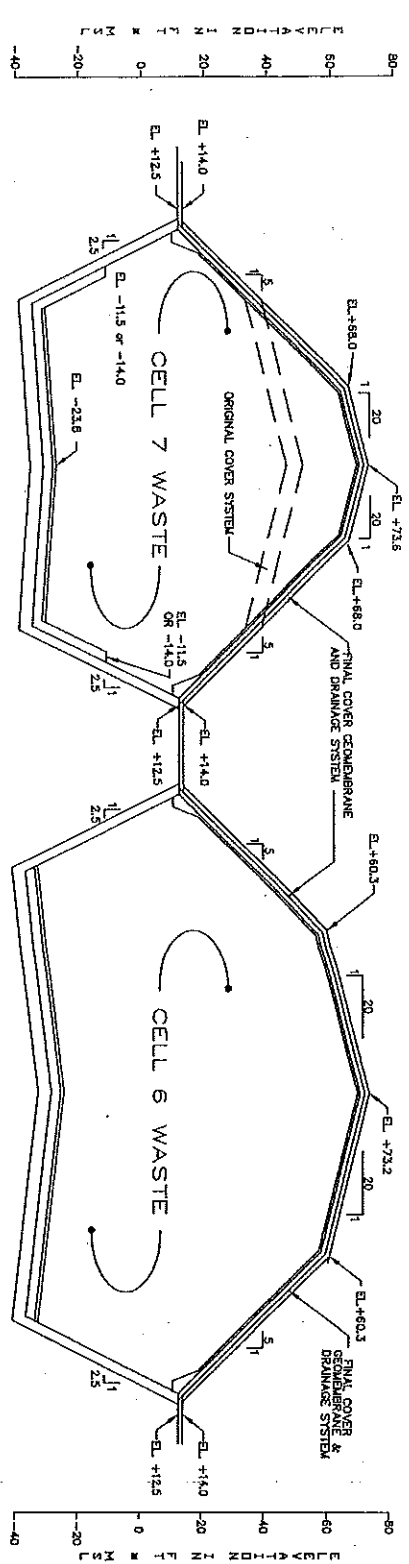


NOTE: GEOMEMBRANE MAY ALSO BE INSTALLED UNDER PROTECTIVE GEOTEXTILE

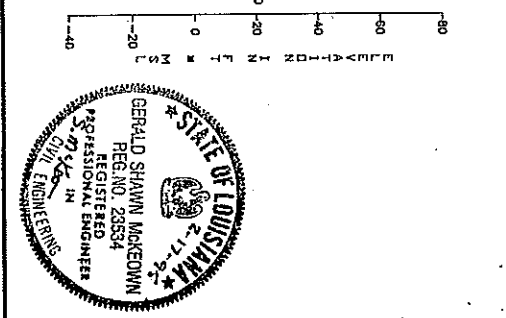
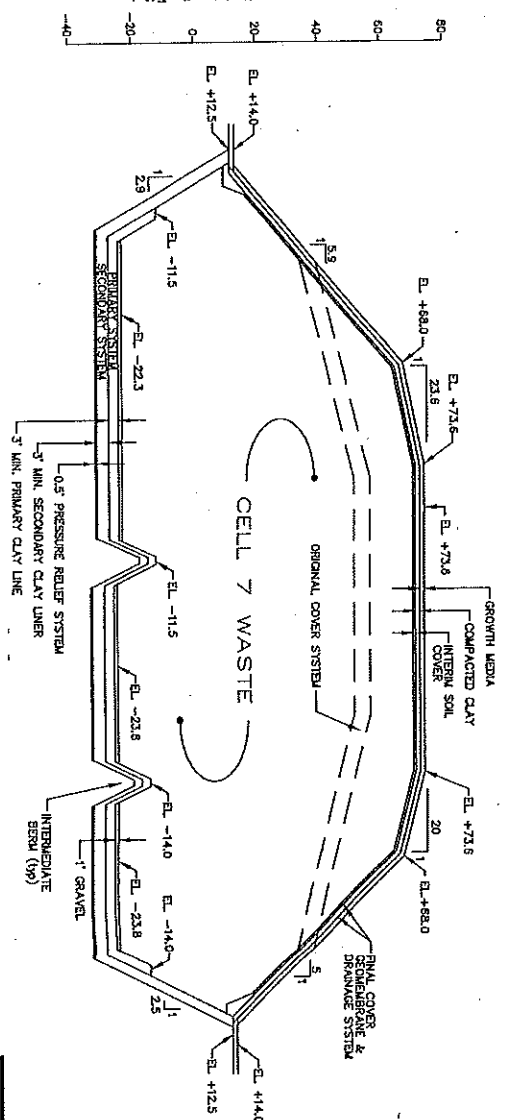
NOTE: ALL GEOMEMBRANE TO BE TEXTURED

000601

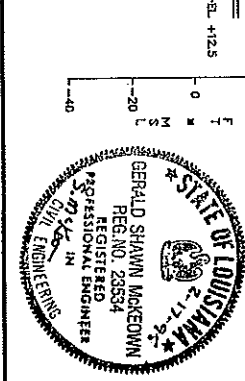




**SECTION**  
A-A' A-A'  
717 719 718 719  
HORIZONTAL SCALE IN FEET  
0 100 200 300 400  
VERTICAL SCALE ENLARGED 5x



**SECTION**  
B-B' B-B'  
717 719 718 719  
HORIZONTAL SCALE IN FEET  
0 100 200 300 400  
VERTICAL SCALE ENLARGED 5x



- NOTES:**
1. ALL ELEVATIONS ARE IN FEET RELATIVE TO MEAN SEA LEVEL.
  2. THE ELEVATIONS SHOWN REPRESENT THE UPPEMOST SURFACE OF THE FINAL COVER GROWTH MEDIA LAYER.
  3. THESE CROSS SECTIONS ARE CONCEPTUAL IN NATURE. THE ACTUAL CONSTRUCTION LOCATIONS, ELEVATIONS, AND DETAILS MAY VARY FROM THOSE SHOWN. REVISED DRAWINGS WILL BE DEVELOPED PRIOR TO CONSTRUCTION.
  4. SEE SHEETS 3 AND 4 FOR THE BELOW AND ABOVE GRADE CROSS SECTION LOCATIONS RESPECTIVELY.
  5. TOP 5' OF WASTE SHALL CONSIST OF SELECT MATERIAL FREE OF RAIL COVER DUE TO TOXICITY IN THE WASTE.
  6. COORDINATES TAKE PRECEDENCE OVER DRAWING SCALE.

**Golder Associates** Houston, Texas

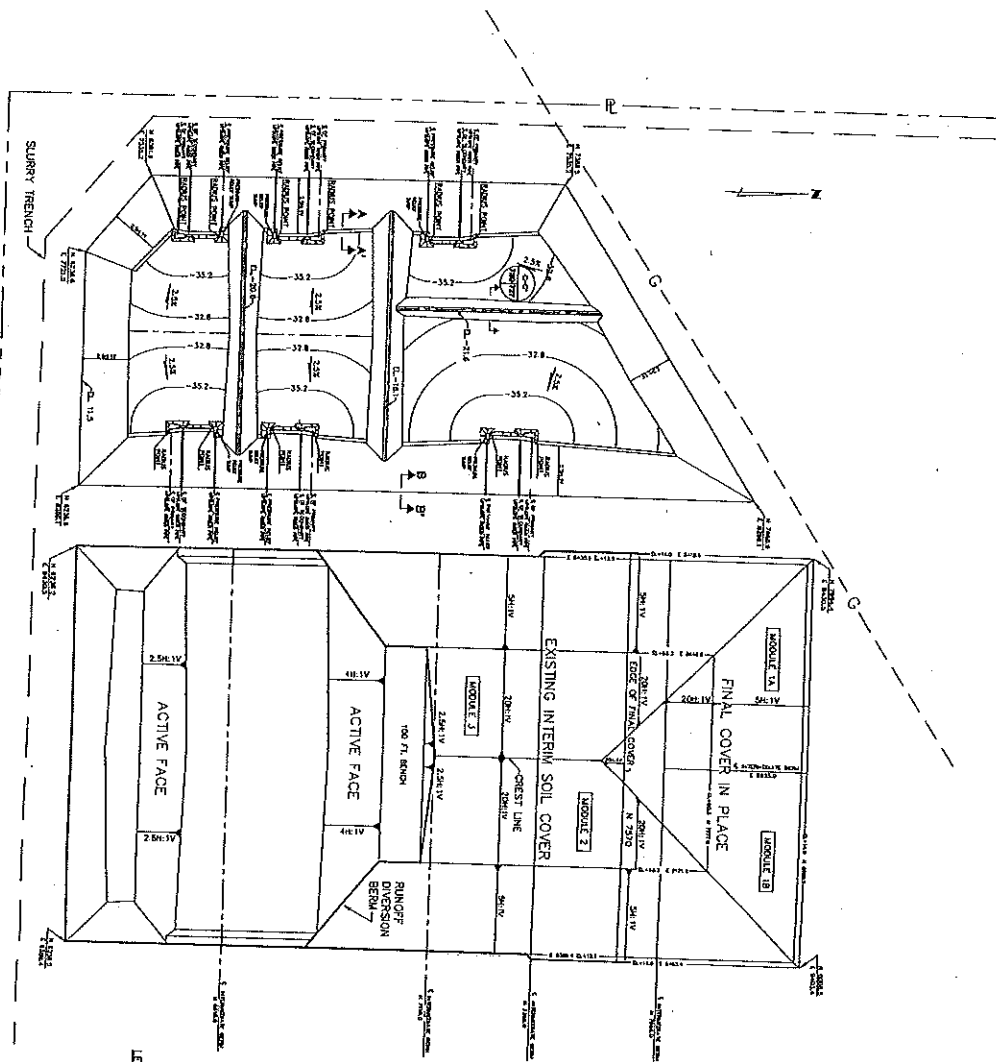
Chemical Waste Management, Inc.  
Oak Brook, Illinois 60061

**CELL 7**

**LANDFILL DEVELOPMENT AND FINAL COVER CROSS SECTIONS**

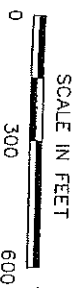
Project: LAKE CHARLES FACILITY  
EPA ID. NUMBER: LA000077201

DATE	BY	DATE	BY
DESIGNED	dhg	DATE	JANUARY 1995
DRAWN	dp	SCALE	AS SHOWN
REVIEWED	smv	PLT. NO.	853-3187
		FIGURE NO.	719
			6

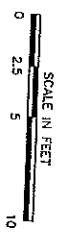
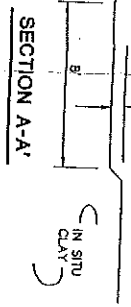
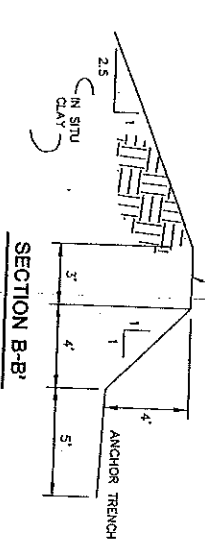


CELL 7

CELL 6



LEGEND:  
 --- C --- HIGH PRESSURE GAS PIPE LINE  
 --- P --- PROPERTY LINE  
 --- S --- SLURRY TRENCH



000604

STANDARD LIST OF  
 SYMBOLS FOR GEOTECHNICALS  
 --- GEOMET  
 --- PROTECTIVE GEOTEXTILE  
 --- FILTER GEOTEXTILE  
 --- SOIL/ROCK GEOTEXTILE  
 --- SOIL/ROCK GEOTEXTILE

- NOTES:
1. THIS PLAN IS CONCEPTUAL IN NATURE. THE ACTUAL CONSTRUCTION DETAILS MAY VARY FROM THOSE SHOWN.
  2. COORDINATES TAKE PRECEDENCE OVER DRAWING SCALE.
  3. ALL ELEVATIONS ARE IN FEET RELATIVE TO MEAN SEA LEVEL.
  4. BASE OF EXCAVATION.
  5. ELEVATIONS AND POINTS ON THIS SHEET ARE TAKEN AT THE
  6. ELEVATIONS AND POINTS SHOWN ON FLOOR ARE APPROXIMATE.
  7. THE SLURRY TRENCH IS CONSTRUCTED FROM COORDINATES (N 6025.7927, E 5640) (N 6140, E 7890) AND (N 6631, E 7392).
  8. THE PROPERTY LINE IS CONSTRUCTED FROM COORDINATES (N 6025.7927, E 1009.3539), (N 6043.498, E 7382.44), AND (N 6888.006, E 7342.79).

**Goldier Associates** Houston, Texas  
 Chemical Waste Management, Inc.  
 Oak Brook, Illinois 60521

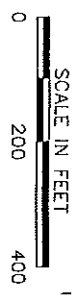
PROJECT	LAKE CHARLES FACILITY		
	EPA I.D. NUMBER LAD000777201		
CELL 7			
EXCAVATION PLAN			
DATE	22 FEBRUARY 1995	39 NO.	933-4177
SCALE	AS SHOWN	DATE	720





SLURRY TRENCH

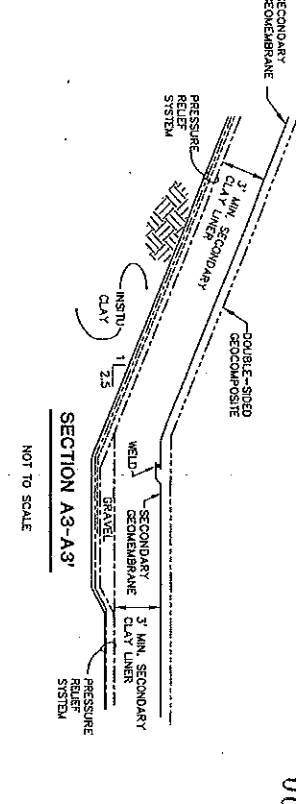
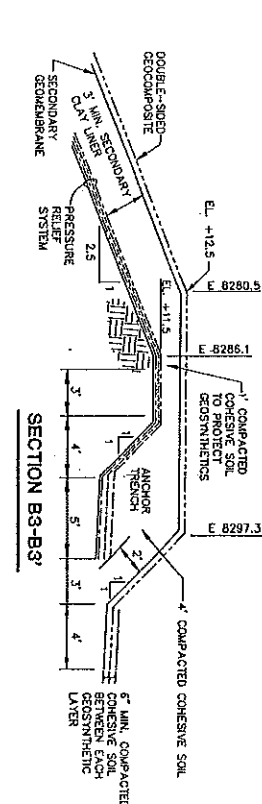
ACCESS CORRIDOR



- STANDARD LIST OF SYMBOLS FOR GEOSYNTHETICS
- GEONET
  - TEXTURED GEOMEMBRANE
  - PROTECTIVE GEOTEXTILE
  - SACRIFICIAL GEOTEXTILE
  - DOUBLE SIDED GEOCOMPOSITE
- LEGEND:
- G — HIGH PRESSURE GAS PIPE LINE
  - R — PROPERTY LINE
  - SLURRY TRENCH

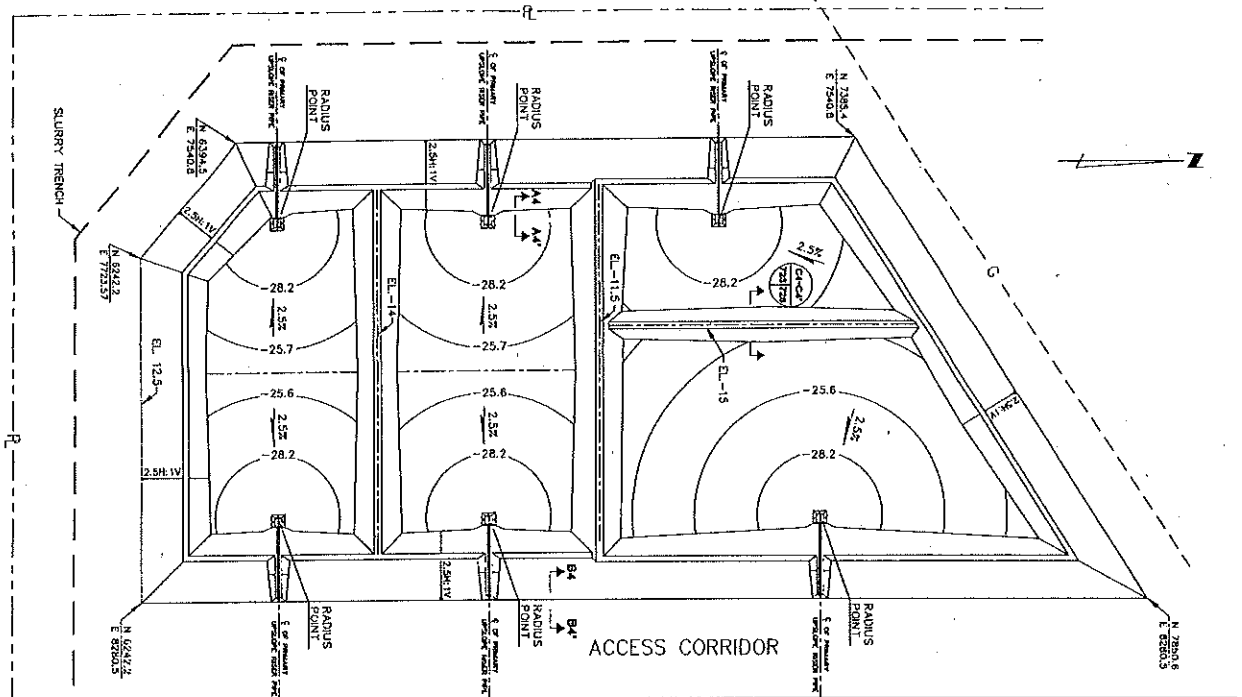
NOTES:

1. THIS PLAN IS CONCEPTUAL IN NATURE. THE ACTUAL CONSTRUCTION LOCATIONS, ELEVATIONS, AND DETAILS MAY VARY FROM THOSE SHOWN. DETAILED DRAWINGS WILL BE DEVELOPED PRIOR TO CONSTRUCTION.
2. COORDINATES TAKE PRECEDENCE OVER DRIVING SCALE.
3. ALL ELEVATIONS ARE IN FEET RELATIVE TO MEAN SEA LEVEL.
4. LINES AND ELEVATIONS SHOWN ON THIS SHEET ARE TAKEN AT THE TOP OF THE SECONDARY CONTAINMENT AND COLLECTION SYSTEMS.
5. RADII CONTROL POINTS ON THIS SHEET ARE AT EL. -53.95.
6. ELEVATIONS AND COORDINATES SHOWN ON FLOOR ARE APPROXIMATE.
7. THE SLURRY TRENCH IS CONSTRUCTED FROM COORDINATES (N 6125, E 9640), (N 6140, E 7690), AND (N 9630, E 7392).
8. THE PROPERTY LINE IS CONSTRUCTED FROM COORDINATES (N 6025, 7557, E 10063, 5530), (N 6042, 426, E 7338, 244), AND (N 8656, 006, E 7342, 279).



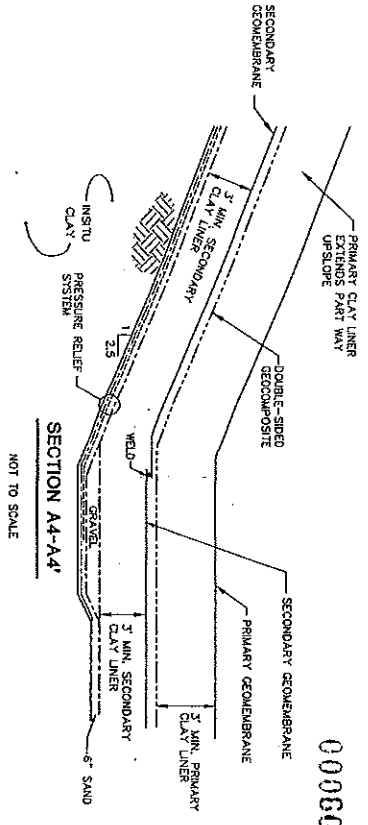
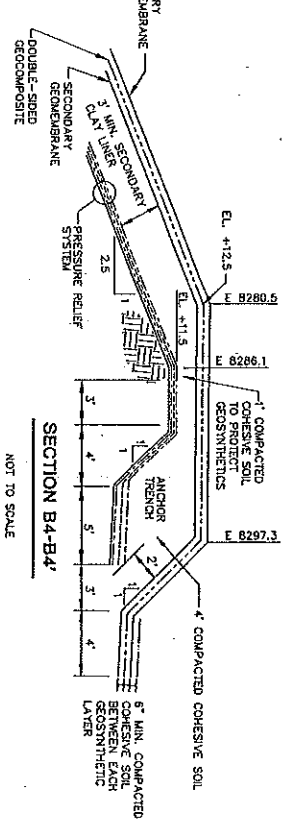
000606

		Golder Associates		Houston, Texas	
		Chemical Waste Management, Inc.		Oak Brook, Illinois 60521	
PROJECT	LAKE CHARLES FACILITY	CELL 7	SECONDARY CONTAINMENT AND COLLECTION SYSTEMS	DATE	FEBRUARY 1995
DESIGNED	PP	SCALE	AS SHOWN	DWG. NO.	933-4177
REVIEWED	SW	FILE NO.	853-3197	REVISION NO.	722
				8	



- LEGEND:**
- G — HIGH PRESSURE GAS PIPE LINE
  - R — PROPERTY LINE
  - SLURRY TRENCH
- STANDARD LIST OF SYMBOLS FOR GEOSYNTHETICS**
- GEON. 1
  - TEXTURED GEOMEMBRANE
  - PROTECTIVE GEOTEXTILE
  - ALUMINUM GEOTEXTILE
  - DOUBLE SIDED GEOCOMPOSITE

SCALE IN FEET  
200 400

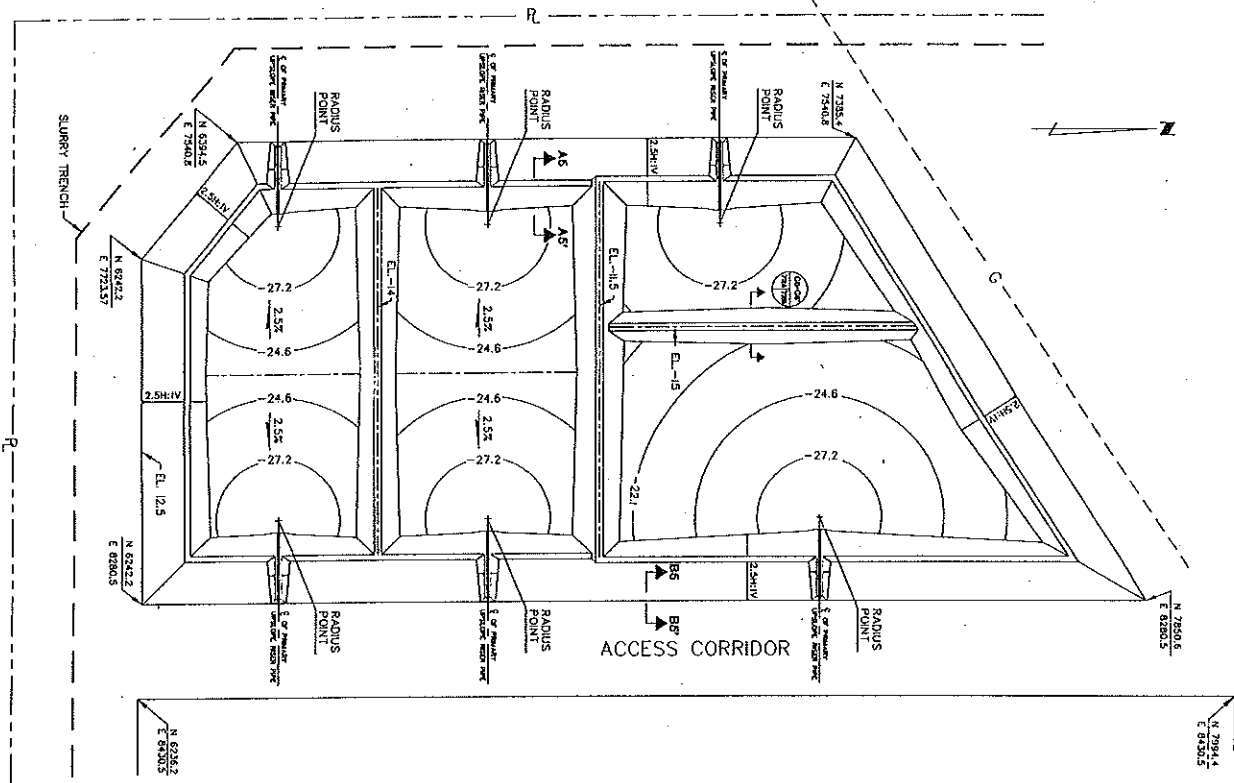


- NOTES:**
- THIS PLAN IS CONCEPTUAL IN NATURE. THE ACTUAL CONSTRUCTION SHALL BE BASED ON THE ACTUAL FIELD CONDITIONS. DETAILED DRAWINGS WILL BE DEVELOPED PRIOR TO CONSTRUCTION.
  - COORDINATES TAKE PRECEDENCE OVER DRAWING SCALE.
  - ALL ELEVATIONS ARE IN FEET RELATIVE TO MEAN SEA LEVEL.
  - LINE AND ELEVATIONS SHOWN ON THIS SHEET ARE TAKEN AT THE TOP OF THE PRIMARY CONTAINMENT SYSTEM.
  - RADIUS CONTROL POINTS ON THIS SHEET ARE AT EL. -30.55.
  - ELEVATIONS AND CONTOURS SHOWN ON FLOOR ARE APPROXIMATE.
  - THE SLURRY TRENCH IS CONSTRUCTED FROM COORDINATES (N 6125, E 8640), (N 0190, E 7890), AND (N 0831, E 7352).
  - THE PROPERTY LINE IS CONSTRUCTED FROM COORDINATES (N 6025.7927, E 10009.3539), (N 6043.498, E 7336.244), AND (N 5686.008, E 7342.279).

**Goldier Associates**  
Houston, Texas

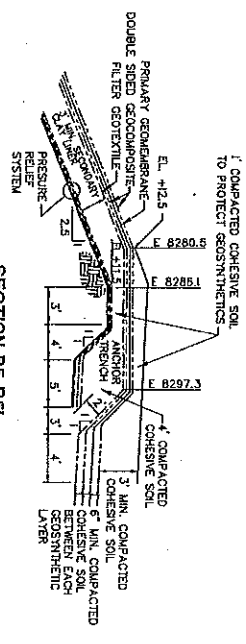
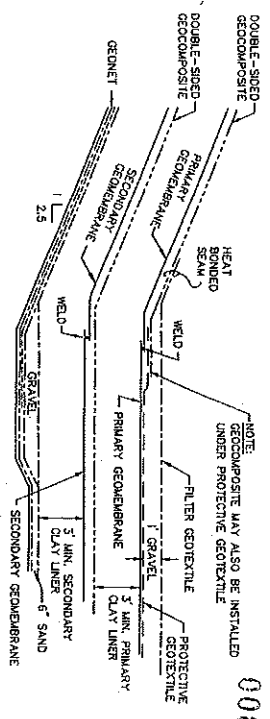
Chemical Waste Management, Inc.  
Oak Brook, Illinois 60521

PROJECT			
LAKE CHARLES FACILITY			
EPA I.D. NUMBER LAD00077201			
CELL 7			
PRIMARY CONTAINMENT SYSTEM			
DATE	DATE	DATE	DATE
1995	1995	1995	1995
03-31-97	03-31-97	03-31-97	03-31-97
REVIEWED	SCALE	AS SHOWN	DATE
5/4	5/4	5/4	5/4
FILE NO.	853-3197	FILE NO.	853-3197
DATE	03-31-97	DATE	03-31-97
723	723	723	723



- STANDARD LIST OF SYMBOLS FOR GEOSYNTHETICS -
- G --- GEOTEXTILE
  - R --- TEXTURED GEOMEMBRANE
  - P --- PROTECTIVE GEOTEXTILE
  - S --- FILTER GEOTEXTILE
  - D --- DOUBLE SIDED GEOMEMBRANE

- LEGEND
- C --- HIGH PRESSURE GAS PIPE LINE
  - R --- PROPERTY LINE
  - S --- SLURRY TRENCH

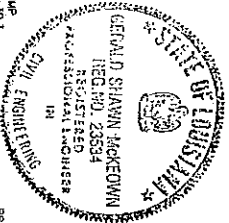


- NOTES:
1. THIS PLAN IS CONCEPTUAL IN NATURE. THE ACTUAL CONSTRUCTION LOCATIONS, ELEVATIONS, AND DETAILS MAY VARY FROM THE PRELIMINARY DETAILED DRAWINGS WILL BE DEVELOPED PRIOR TO CONSTRUCTION.
  2. COORDINATES TAKE PRECEDENCE OVER DRAINING SCALE.
  3. ALL ELEVATIONS ARE IN FEET RELATIVE TO MEAN SEA LEVEL.
  4. LINES AND ELEVATIONS SHOWN ON THIS SHEET ARE TAKEN AT THE TOP OF THE PRIMARY COLLECTION SYSTEM.
  5. ELEVATIONS AND COORDINATES SHOWN ON FLOOR ARE APPROXIMATE.
  6. THE SLURRY TRENCH IS CONSTRUCTED FROM COORDINATES (N 6225.7527, E 8449.0), (N 6240, E 7550), AND (N 6251, E 7252).
  7. THE PROPERTY LINE IS CONSTRUCTED FROM COORDINATES (N 6025.7527, E 10005.3538), (N 6043.489, E 7338.244), AND (N 8856.005, E 7342.279).

**GP** **Goldier Associates** Houston, Texas

Chemical Waste Management, Inc.  
Oak Brook, Illinois 60521

PROJECT				LAKE CHARLES FACILITY			
				EPA I.D. NUMBER LAD000777201			
CELL 7				PRIMARY COLLECTION SYSTEM			
DESIGN	DATE	SCALE	BY	DATE	SCALE	BY	DATE
GP	FEBRUARY 1995	AS SHOWN	GP	FEBRUARY 1995	AS SHOWN	GP	FEBRUARY 1995
CHECKED	DATE	SCALE	BY	CHECKED	DATE	SCALE	BY
BP	AS SHOWN	AS SHOWN	BP	AS SHOWN	AS SHOWN	AS SHOWN	BP
REVIEWED	DATE	SCALE	BY	REVIEWED	DATE	SCALE	BY
SL	853-3197	853-3197	SL	853-3197	853-3197	853-3197	SL
10				10			

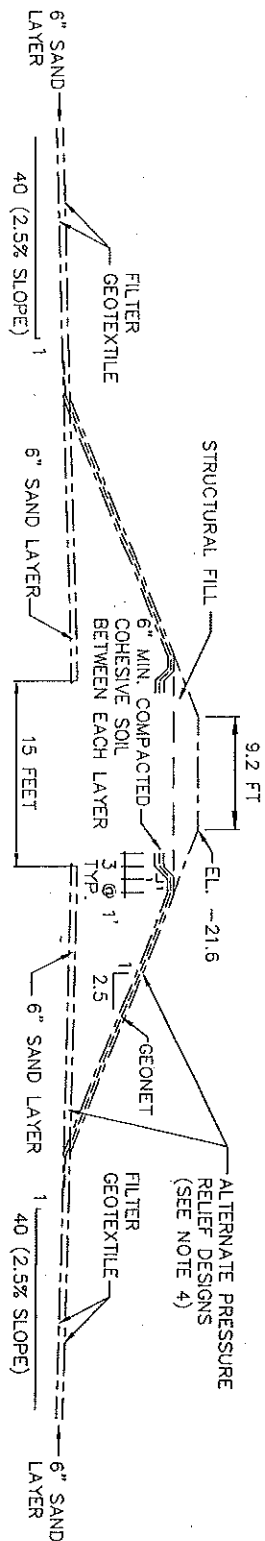
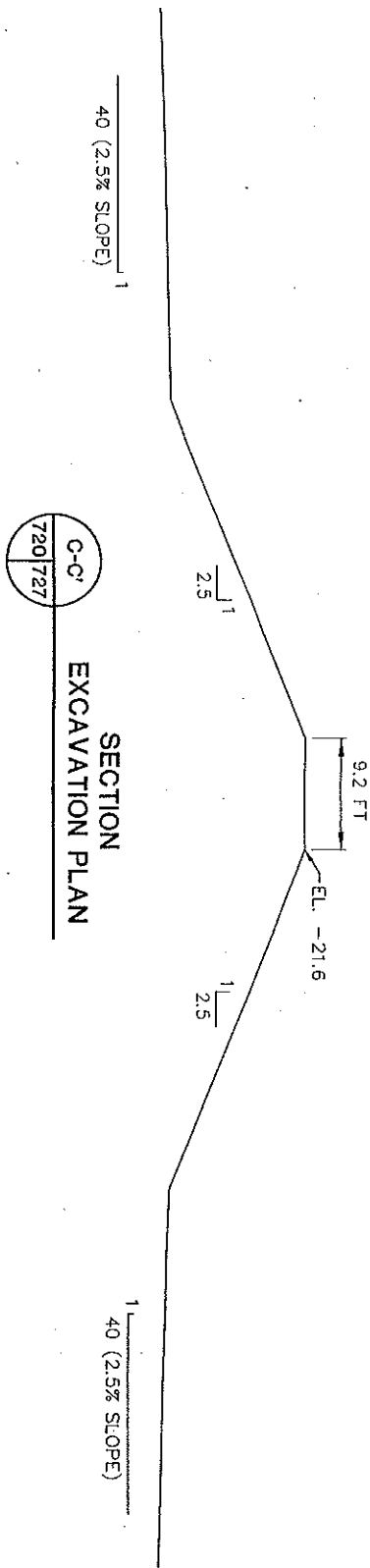


STANDARD LIST OF  
SYMBOLS FOR GEOSYNTHETICS

GEONET
TEXTURED GEOMEMBRANE
PROTECTIVE GEOTEXTILE
FILTER GEOTEXTILE
SACRIFICIAL GEOTEXTILE
DOUBLE SIDED GEOCOMPOSITE

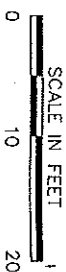


000611  
000612



NOTES:

1. THIS PLAN IS CONCEPTUAL IN NATURE. THE ACTUAL CONSTRUCTION LOCATIONS, ELEVATIONS, AND DETAILS MAY VARY FROM THOSE SHOWN. DETAILED DRAWINGS WILL BE DEVELOPED PRIOR TO CONSTRUCTION.
2. COORDINATES TAKE PRECEDENCE OVER DRAWING SCALE.
3. ALL ELEVATIONS ARE IN FEET RELATIVE TO MEAN SEA LEVEL.
4. THE PRESSURE RELIEF DESIGNS AT THE DIVIDER BERM WILL BE EITHER OVER THE BERM OR UNDER THE BERM AS SHOWN ABOVE.

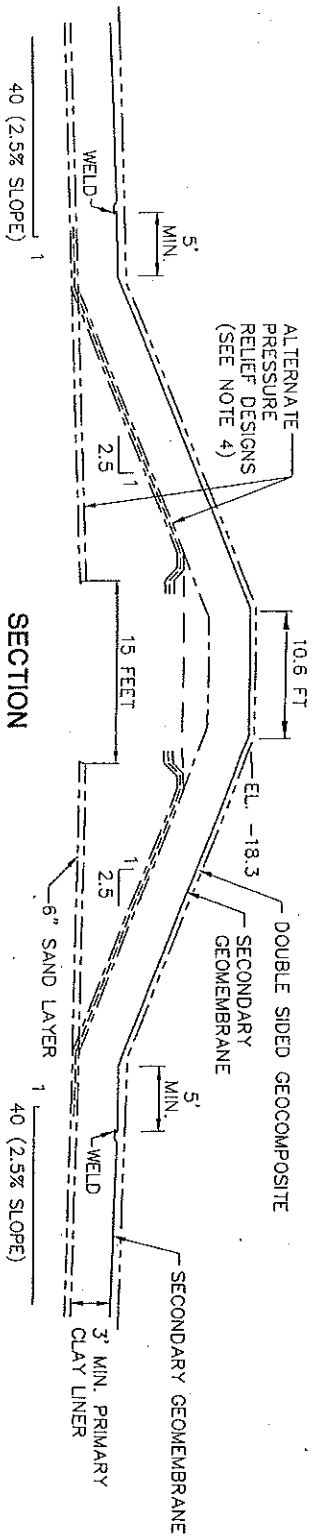


STANDARD LIST OF  
SYMBOLS FOR GEOSYNTHETICS

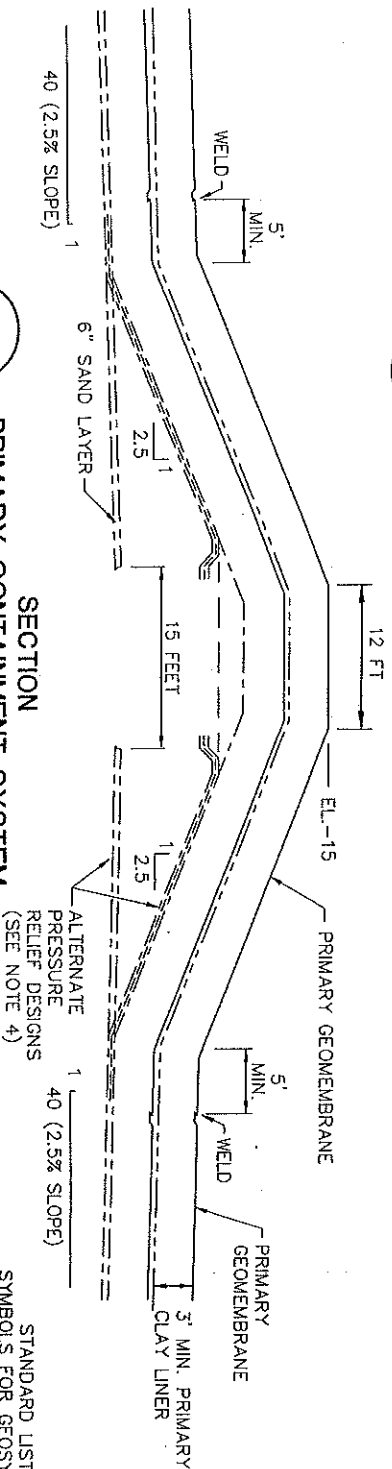
- GEONET
- TEXTURED GEOMEMBRANE
- PROTECTIVE GEOTEXTILE
- FILTER GEOTEXTILE
- SACRIFICIAL GEOTEXTILE
- DOUBLE SIDED GEOCOMPOSITE

<p><b>Golder Associates</b> Houston, Texas</p>		<p>Project: LAKE CHARLES FACILITY EPA I.D. NUMBER LAD000777201</p>	
<p>CELL 7 NORTH/SOUTH DIVIDER BERM SECTIONS 1</p>		<p>Drawn: dng Checked: 2P Reviewed: SWY</p>	
<p>DATE: FEBRUARY 1995 SCALE: AS SHOWN FILE NO.: 853-3197</p>		<p>ISS. NO.: 933-4177 DWG. NO.: 727 PAPER NO.: 18</p>	

FOR: Chemical Waste Management, Inc.  
Oak Brook, Illinois 60521



### SECTION C3-C3' 722/728 SECONDARY CONTAINMENT AND COLLECTION SYSTEMS



### SECTION C4-C4' 723/728 PRIMARY CONTAINMENT SYSTEM

ALTERNATE  
PRESSURE  
RELIEF DESIGNS  
(SEE NOTE 4)

STANDARD LIST OF  
SYMBOLS FOR GEOSYNTHETICS

- GEONET
- TEXTURED GEOMEMBRANE
- PROTECTIVE GEOTEXTILE
- FILTER GEOTEXTILE
- SACRIFICIAL GEOTEXTILE
- DOUBLE SIDED GEOCOMPOSITE

#### NOTES:

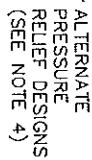
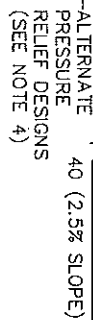
1. THIS PLAN IS CONCEPTUAL IN NATURE. THE ACTUAL CONSTRUCTION LOCATIONS, ELEVATIONS, AND DETAILS MAY VARY FROM THOSE SHOWN. DETAILED DRAWINGS WILL BE DEVELOPED PRIOR TO CONSTRUCTION.
2. COORDINATES TAKE PRECEDENCE OVER DRAWING SCALE.
3. ALL ELEVATIONS ARE IN FEET RELATIVE TO MEAN SEA LEVEL.
4. THE PRESSURE RELIEF DESIGNS AT THE DIVIDER BERM WILL BE EITHER OVER THE BERM OR UNDER THE BERM AS SHOWN ABOVE.



**Golder Associates**  
Houston, Texas  
Chemical Waste Management, Inc.  
Oak Brook, Illinois 60521

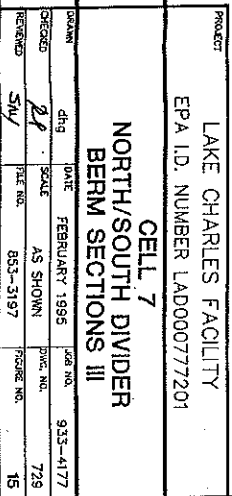
PROJECT		LAKE CHARLES FACILITY	
EPA I.D. NUMBER		LAD000777201	
CELL 7		NORTH/SOUTH DIVIDER	
BERM SECTIONS II			
DESIGNED	DATE	BY	NO.
CHECKED	DATE	BY	NO.
REVIEWED	DATE	BY	NO.
DATE	SCALE	AS SHOWN	933-4177
FILE NO.	853-3197	FIGURE NO.	728
			14

51300



GEONET  
TEXTURED GEOMEMBRANE  
PROTECTIVE GEOTEXTILE  
FILTER GEOTEXTILE  
SACRIFICIAL GEOTEXTILE  
DOUBLE SIDED GEOCOMPOSITE

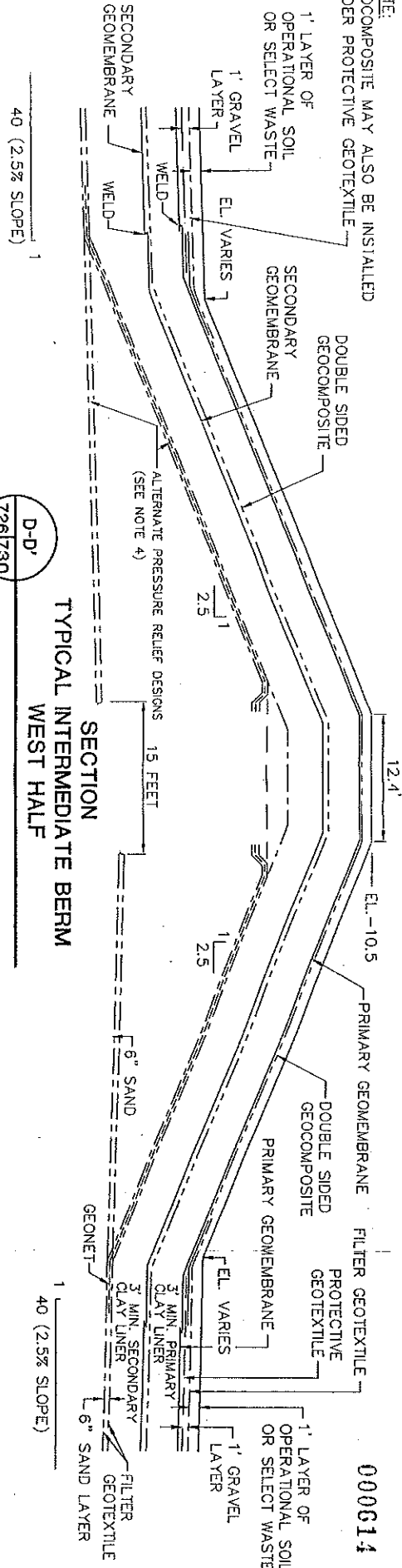
- 





NOTE:

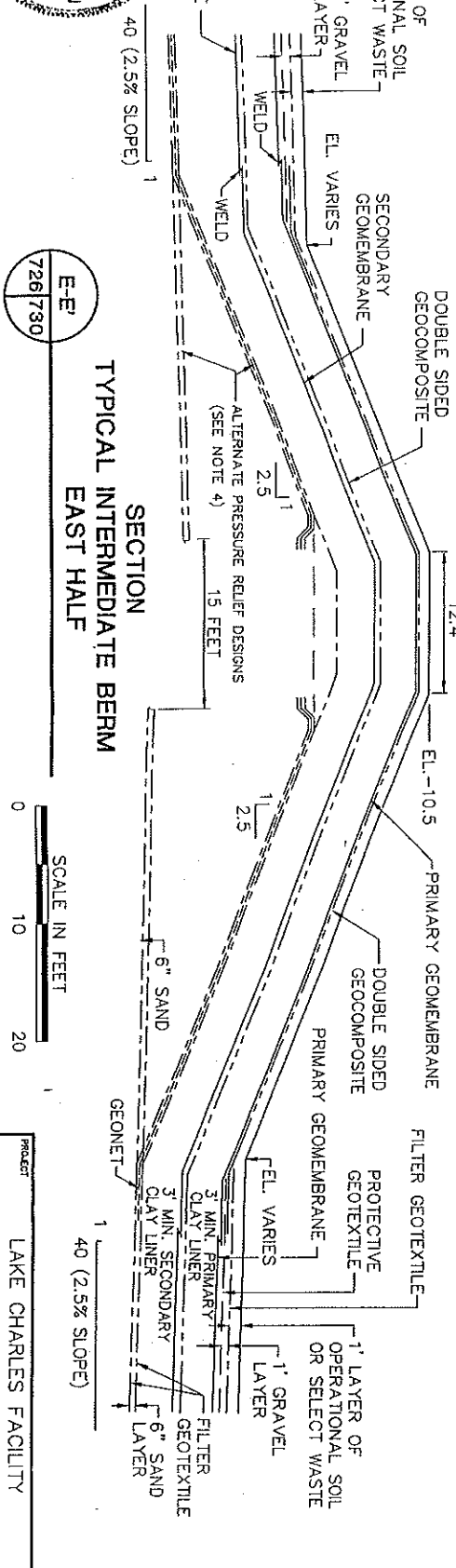
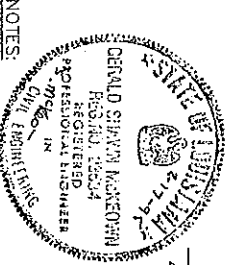
GEOCOMPOSITE MAY ALSO BE INSTALLED UNDER PROTECTIVE GEOTEXTILE



000614

NOTE:

1. THIS PLAN IS CONCEPTUAL IN NATURE. THE ACTUAL CONSTRUCTION LOCATIONS, ELEVATIONS, AND DETAILS MAY VARY FROM THOSE SHOWN. DETAILED DRAWINGS WILL BE DEVELOPED PRIOR TO CONSTRUCTION.
2. COORDINATES TAKE PRECEDENCE OVER DRAWING SCALE.
3. ALL ELEVATIONS ARE IN FEET RELATIVE TO MEAN SEA LEVEL.
4. THE PRESSURE RELIEF DESIGNS AT THE DIVIDER BERM WILL BE EITHER OVER OR UNDER THE BERM AS SHOWN ABOVE.



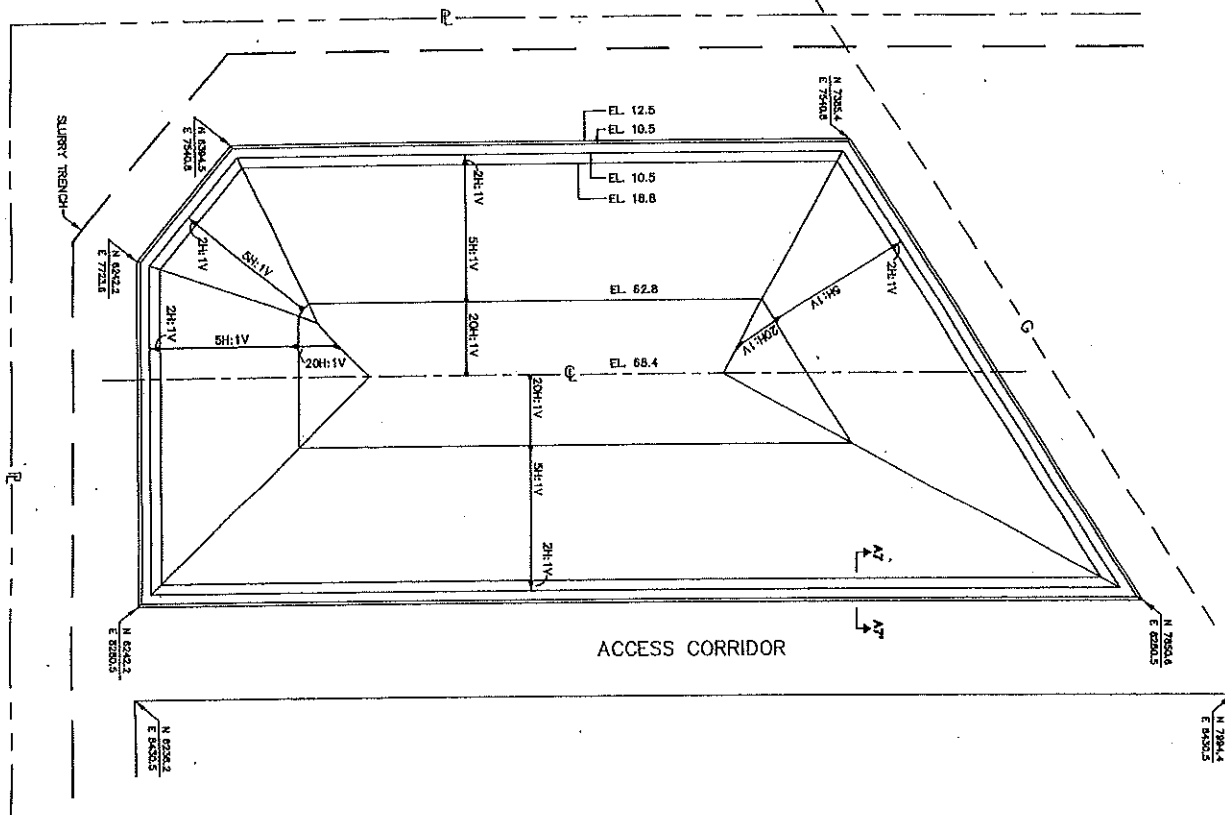
SCALE IN FEET



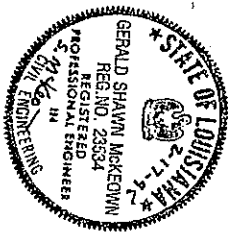
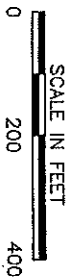
STANDARD LIST OF SYMBOLS FOR GEOSYNTHETICS

- GEONET
- TEXTURED GEOMEMBRANE
- PROTECTIVE GEOTEXTILE
- FILTER GEOTEXTILE
- SACRIFICIAL GEOTEXTILE
- DOUBLE SIDED GEOCOMPOSITE

		<b>Golder Associates</b>		Houston, Texas	
Chemical Waste Management, Inc.		Oak Brook, Illinois 60521			
PROJECT LAKE CHARLES FACILITY EPA I.D. NUMBER LAD00077201	CELL 7	DRAWN DPS	DATE JANUARY 1995	JOB NO. 933-4177	SHEET NO. 730
CHECKED DPS	AS SHOWN	PREPARED SKY	853-3197	PROJECT NO.	16



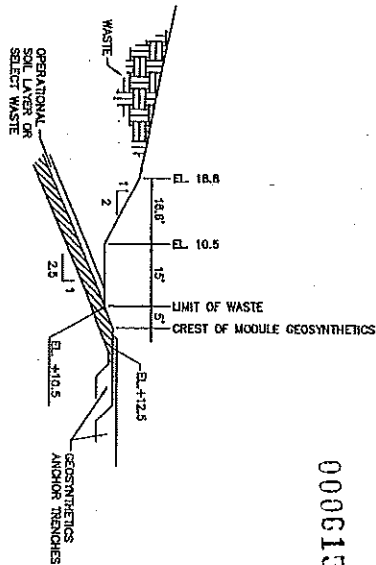
LEGEND:  
 G — HIGH PRESSURE GAS PIPE LINE  
 P — PROPERTY LINE  
 S — SLURRY TRENCH



#### NOTES:

1. THIS PLAN IS CONCEPTUAL IN NATURE. THE ACTUAL CONSTRUCTION LOCATIONS, ELEVATIONS, AND DETAILS MAY VARY FROM THOSE SHOWN. DETAILED DRAWINGS WILL BE DEVELOPED PRIOR TO CONSTRUCTION.
2. COORDINATES TAKE PRECEDENCE OVER DRIVING SCALE.
3. ALL ELEVATIONS ARE IN FEET RELATIVE TO MEAN SEA LEVEL.
4. LINES AND ELEVATIONS SHOWN ON THIS SHEET ARE TAKEN AT THE TOP OF THE SURFACE OF WASTE.
5. THE SLURRY TRENCH IS CONSTRUCTED FROM COORDINATES (N 8125, E 9440), (N 8140 E 7980), AND (N 8201, E 7392).
6. THE PROPERTY LINE IS CONSTRUCTED FROM COORDINATES (N 6025, E 7927, E 10009, 3538), (N 8043, 488, E 7358, 244), AND (N 8558, 055, E 7342, 279).

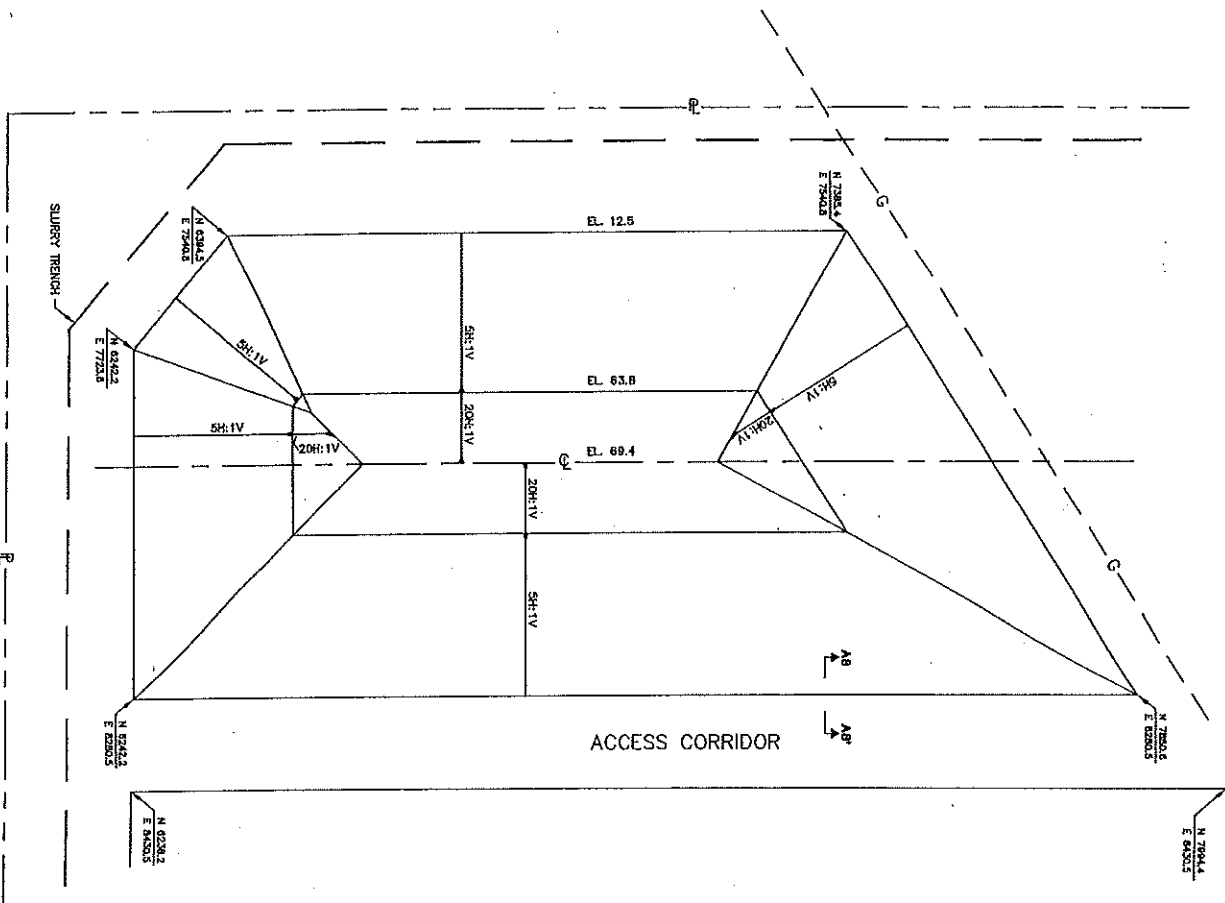
#### SECTION A7-A7' PERIMETER RUNOFF CONTROL DITCH



000015

**Golden Associates**  
 Houston, Texas  
 Chemical Waste Management, Inc.  
 Oak Brook, Illinois 60521

PROJECT	LAKE CHARLES FACILITY			
	EPA I.D. NUMBER LAD000777201			
PRODUCT	CELL 7			
	SURFACE OF WASTE			
DESIGNED BY	DATE	SCALE	JOB NO.	933-4177
REVIEWED BY	DATE	SCALE	AS SHOWN	731
DATE	853-3197	731	731	17



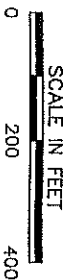
# TYPICAL SECTION

NOT TO SCALE

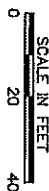
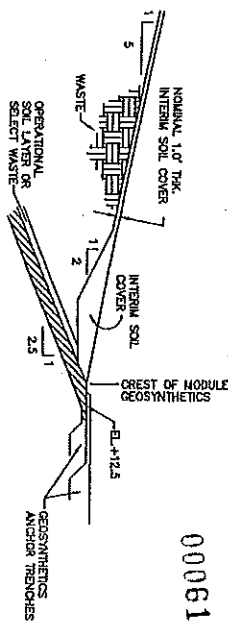


## LEGEND:

- G — HIGH PRESSURE GAS PIPE LINE
- P — PROPERTY LINE
- C — SLURRY TRENCH



## SECTION A-B-A' VICINITY OF PERIMETER RUNOFF CONTROL DITCH



000616



## NOTES:

- THIS PLAN IS CONCEPTUAL IN NATURE. THE ACTUAL CONSTRUCTION LOCATIONS, ELEVATIONS, AND DETAILS MAY VARY FROM THOSE SHOWN. DETAILED DRAWINGS WILL BE DEVELOPED PRIOR TO CONSTRUCTION.
- COORDINATES TAKE PRECEDENCE OVER DRAWING SCALE.
- ALL ELEVATIONS ARE IN FEET RELATIVE TO MEAN SEA LEVEL.
- LINE AND ELEVATIONS SHOWN ON THIS SHEET ARE TAKEN AT THE TOP OF THE INTERIOR SOIL COVER.
- THE SLURRY TRENCH IS CONSTRUCTED FROM COORDINATES (N 6125, E 5840), (N 6145, E 7380), AND (N 6331, E 7382).
- THE PROPERTY LINE IS CONSTRUCTED FROM COORDINATES (N 6025, E 7527, E 10009, E 3539), (N 6043, E 7358, E 244), AND (N 6566, E 7342, E 279).

**Golden Associates**  
Houston, Texas  
Chemical Waste Management, Inc.  
Oak Brook, Illinois 60621

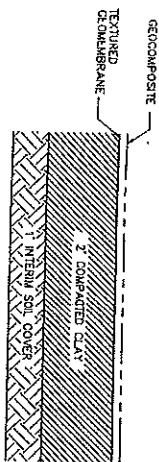
PROJECT:	LAKE CHARLES FACILITY		
	EPA I.D. NUMBER LAD000777201		
CELL 7	INTERIM SOIL COVER		
DATE	JANUARY 1995	JOB NO.	933-4177
SCALE	AS SHOWN	DATE	7/32
FILE NO.	853-3167	REVISION NO.	18

SLURRY TRENCH

ACCESS CORRIDOR

SCALE IN FEET  
0 200 400

LEGEND  
— G — HIGH PRESSURE GAS PIPE LINE  
— P — PROPERTY LINE  
— S — SLURRY TRENCH

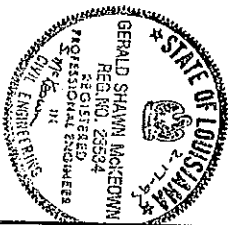


TYPICAL SECTION  
NOT TO SCALE

STANDARD LIST OF  
SYMBOLS FOR GEOSYNTHETICS  
— GEOTEXTILE  
— TEXTURED GEOMEMBRANE  
— PROTECTIVE GEOTEXTILE  
— FILTER GEOTEXTILE  
— DOUBLE BIRD GEOSYNTHETIC  
— DOUBLE BIRD GEOSYNTHETIC

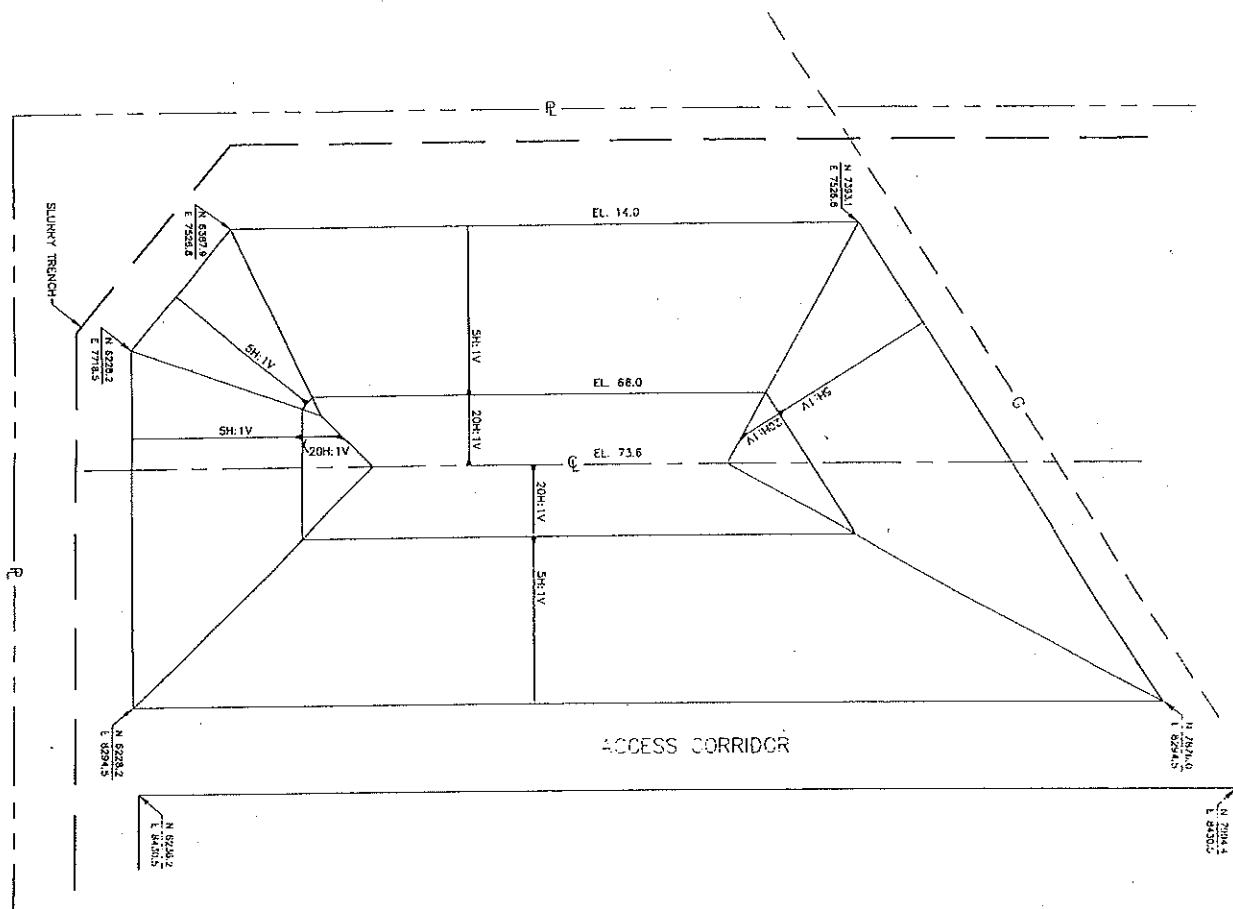
NOTES

1. THIS PLAN IS CONCEPTUAL IN NATURE. THE ACTUAL CONSTRUCTION LOCATIONS, ELEVATIONS, AND DETAILS MAY VARY FROM THOSE SHOWN. DETAILED DRAWINGS WILL BE DEVELOPED PRIOR TO CONSTRUCTION.
2. COORDINATES TAKE PRECEDENCE OVER DRAWING SCALE.
3. ALL ELEVATIONS ARE IN FEET RELATIVE TO MEAN SEA LEVEL.
4. LINES AND ELEVATIONS SHOWN ON THIS SHEET ARE TAKEN AT THE TOP OF THE COMPOSITE COVER SYSTEM.
5. THE SLURRY TRENCH IS CONSTRUCTED FROM COORDINATES (N 6125, E 9640), (N 6140, E 7690), AND (N 8831, E 7352).
6. THE PROPERTY LINE IS CONSTRUCTED FROM COORDINATES (N 6023, 7327, E 10009, 2535), (N 6043, 588, E 7358, 244), AND (N 8885, 006, E 7342, 279).

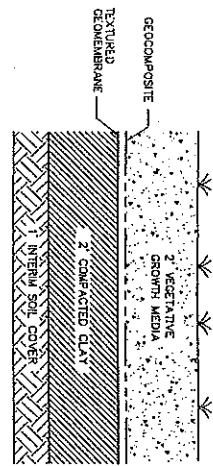
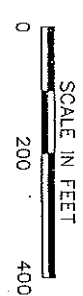


**Goldier Associates**  
Houston, Texas  
Chemical Waste Management, Inc.  
Oak Brook, Illinois 60521

PROJECT			
LAKE CHARLES FACILITY			
EPA I.D. NUMBER LAD000777201			
CELL 7			
COMPOSITE COVER SYSTEM AND SYNTHETIC DRAINAGE LAYER			
DESIGNED	DATE	DATE	DATE
CHKD	1995	1995	1995
SCALE	AS SHOWN	SCALE	SCALE
FILE NO.	FILE NO.	FILE NO.	FILE NO.
733	733	733	733



- LEGEND
- G ——— HIGH PRESSURE GAS PIPE LINE
  - P ——— PROPERTY LINE
  - S ——— SLURRY TRENCH

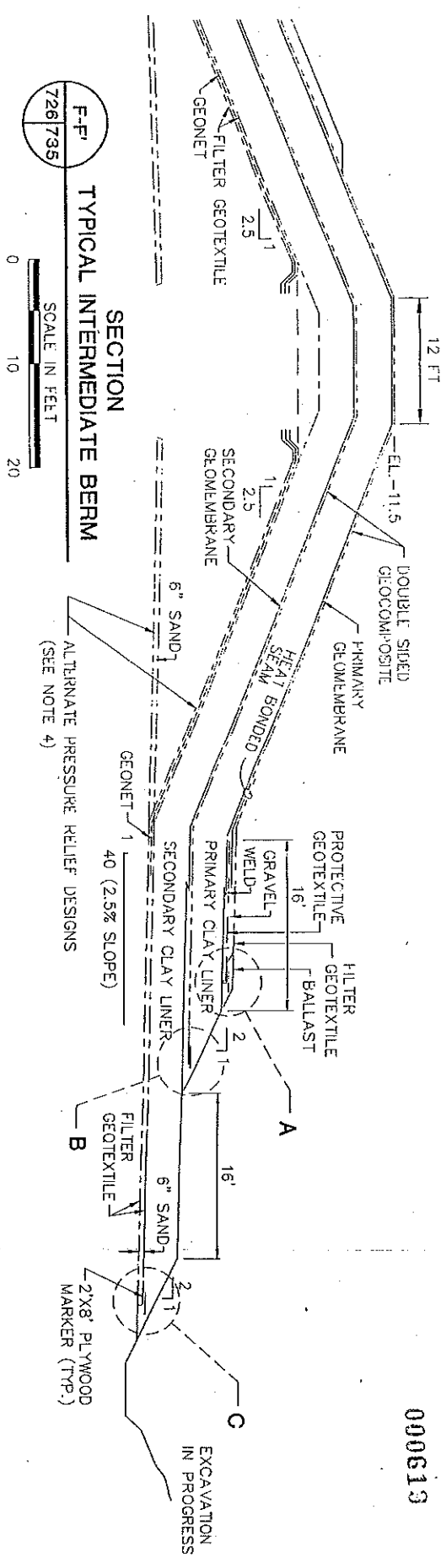


- STANDARD LIST OF SYMBOLS FOR GEOSYNTHETICS
- GEOMET
  - TEXTURED GEOMEMBRANE
  - PROTECTIVE GEOTEXTILE
  - FILTER GEOTEXTILE
  - SEPARATIONAL GEOTEXTILE
  - DOUBLE BOND GEOCOMPOSITE

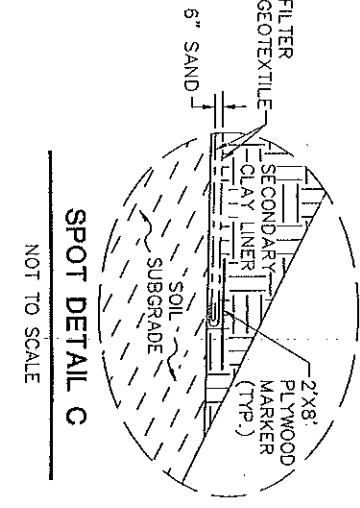
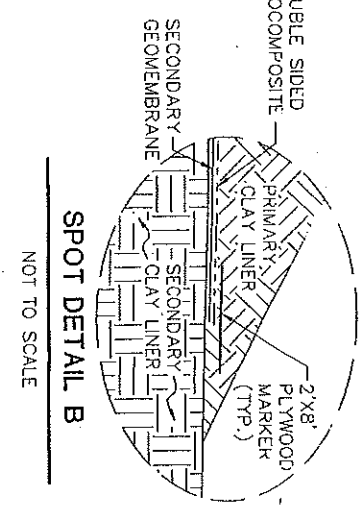
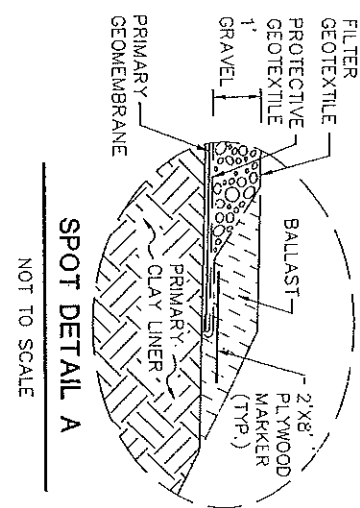
- NOTES:
1. THIS PLAN IS CONCEPTUAL IN NATURE. THE ACTUAL CONSTRUCTION LOCATIONS, ELEVATIONS, AND DETAILS MAY VARY FROM THOSE SHOWN. DETAILED DRAWINGS WILL BE DEVELOPED PRIOR TO CONSTRUCTION.
  2. COORDINATES TAKE PRECEDENCE OVER DRAINING SCALE.
  3. ALL ELEVATIONS ARE IN FEET RELATIVE TO MEAN SEA LEVEL.
  4. LINES AND ELEVATIONS SHOWN ON THIS SHEET ARE TAKEN AT THE TOP OF THE VEGETATIVE GROWTH MEDIA LAYER.
  5. THE SLURRY TRENCH IS CONSTRUCTED FROM COORDINATES (N 6125, E 9640), (N 6140, E 7680), AND (N 8631, E 7382).
  6. THE PROPERTY LINE IS CONSTRUCTED FROM COORDINATES (N 8025, E 9227, E 10009, S 535), (N 8043, E 488, E 7382, 214), AND (N 8888, 006, E 7342, 279).



		<b>Golden Associates</b> Houston, Texas	
FOR: Chemical Waste Management, Inc. Oak Brook, Illinois 60521			
PROJECT: LAKE CHARLES FACILITY EPA I.D. NUMBER LAD000777201		CELL 7	
VEGETATIVE GROWTH MEDIA LAYER			
DRAWN: dng CHECKED: [Signature] REVISION: S-1	DATE: FEBRUARY 1995 SCALE: AS SHOWN FILE NO.: 853-3197	JOB NO.: 933-4177 DWT. NO.: 734 ISSUE NO.: 20	000616



**SECTION**  
**TYPICAL INTERMEDIATE BERM**  
SCALE IN FEET  
0 10 20



**NOTES:**

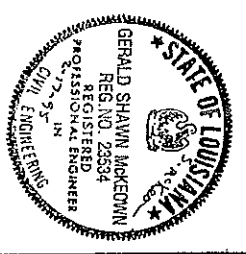
1. THIS PLAN IS CONCEPTUAL IN NATURE. THE ACTUAL CONSTRUCTION LOCATIONS, DIMENSIONS, AND DETAILS MAY VARY FROM THOSE SHOWN. DETAILED DRAWINGS WILL BE DEVELOPED PRIOR TO CONSTRUCTION.
2. COORDINATES TAKE PRECEDENCE OVER DRAWING SCALE.
3. ALL ELEVATIONS ARE IN FEET RELATIVE TO MEAN SEA LEVEL.
4. THE PRESSURE RELIEF DESIGNS AT THE DIVIDER BERM WILL BE EITHER OVER THE BERM OR UNDER THE BERM AS SHOWN ABOVE.

STANDARD LIST OF  
SYMBOLS FOR GEOSYNTHETICS

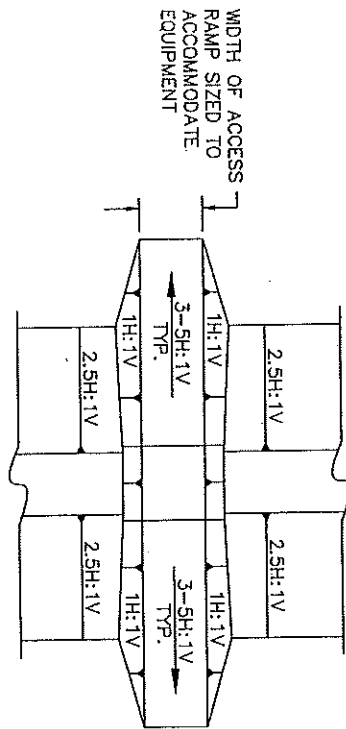
- GEONET
- TEXTURED GEOMEMBRANE
- PROTECTIVE GEOTEXTILE
- FILTER GEOTEXTILE
- DOUBLE SIDED GEOCOMPOSITE

**Golden Associates, Inc.**  
Houston, Texas  
Chemical Waste Management, Inc.  
Oak Brook, Illinois 60521

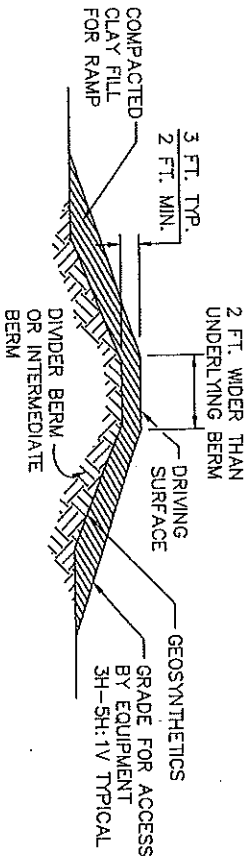
PROJECT	LAKE CHARLES FACILITY			
	EPA I.D. NUMBER LAD000777201			
<b>INTERMEDIATE BERM PROVISION FOR FUTURE TIE-IN</b>				
DATE	FEBRUARY 1995	DWG NO.	933-4177	
SCALE	AS SHOWN	DATE	735	
FILE NO.	853-3197	PROJECT NO.	21	



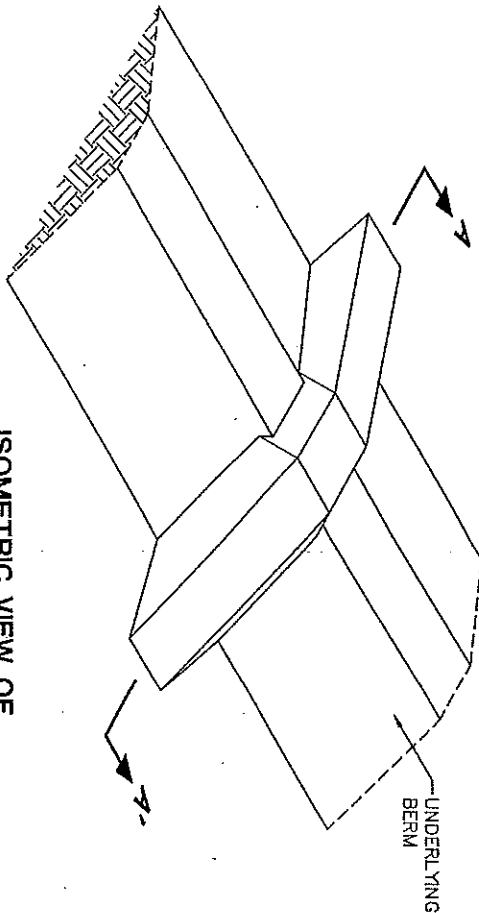
000613



PLAN VIEW

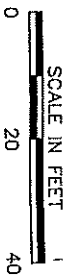


SECTION A-A'



ISOMETRIC VIEW OF  
CONSTRUCTION ACCESS RAMP

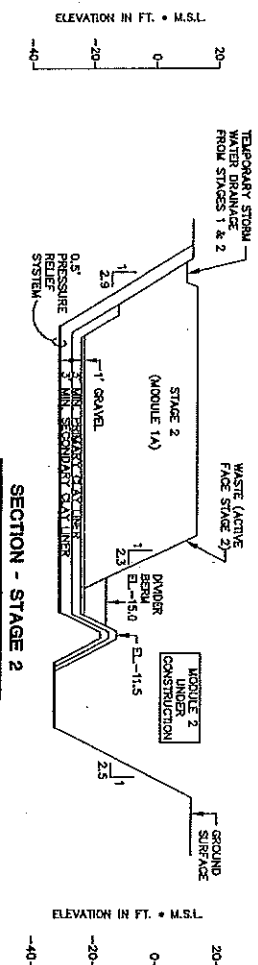
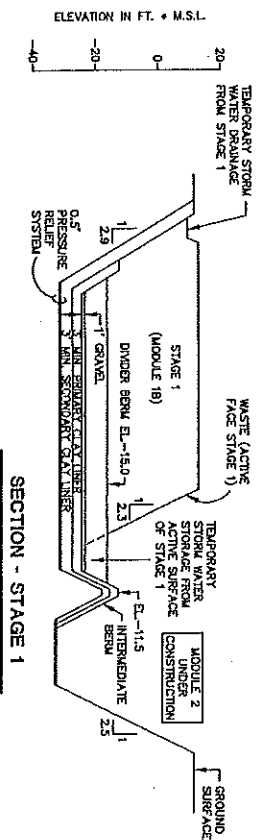
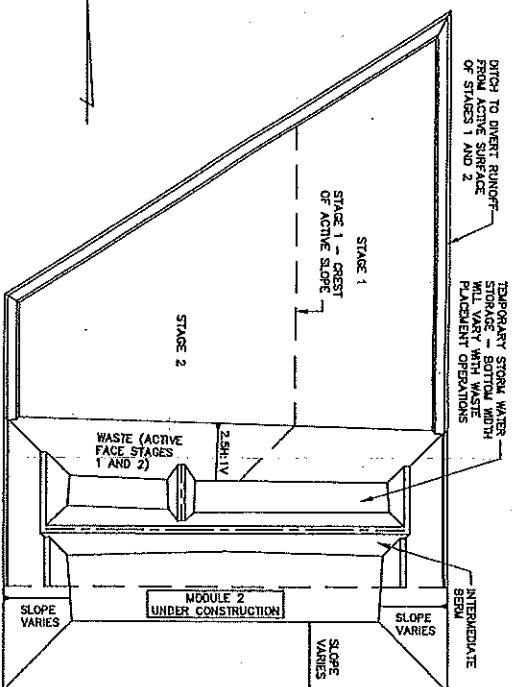
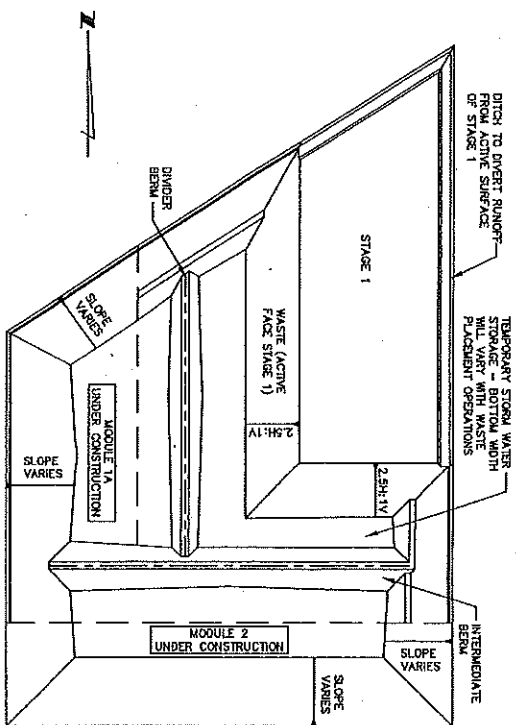
000620



<b>Golder Associates</b> Houston, Texas Chemical Waste Management, Inc. Oak Brook, Illinois 60621		PROJECT: LAKE CHARLES FACILITY EPA I.D. NUMBER LAD000777201	
DRAWN: MFC	DATE: JANUARY 1995	DWG. NO.: 933-4177	
CHECKED: <i>LP</i>	SCALE: AS SHOWN	DWG. NO.: 736	
REVIEWED: <i>SM</i>	FILE NO.: 653-3197	PLATE NO.: 22	
TYPICAL CONSTRUCTION ACCESS RAMP			







- NOTES:
1. OPERATIONAL SEQUENCES SHOWN ARE CONCEPTUAL IN NATURE.
  2. THE LOCATIONS OF THE RUN OFF OVERFLOW BERMS AND DITCHES MAY VARY DEPENDING ON THE ACTUAL SEQUENCE OF WASTE PLACEMENT OPERATIONS.
  3. HAUL ROADS FOR WASTE PLACEMENT ACCESS ARE NOT SHOWN FOR CLARITY. THE LOCATIONS, LINES AND GRADES WILL VARY WITH EACH OPERATIONAL STAGE.



HORIZONTAL SCALE IN FEET

0 200 400

VERTICAL SCALE EXAGGERATED 5X

FOR

**Goldier Associates**

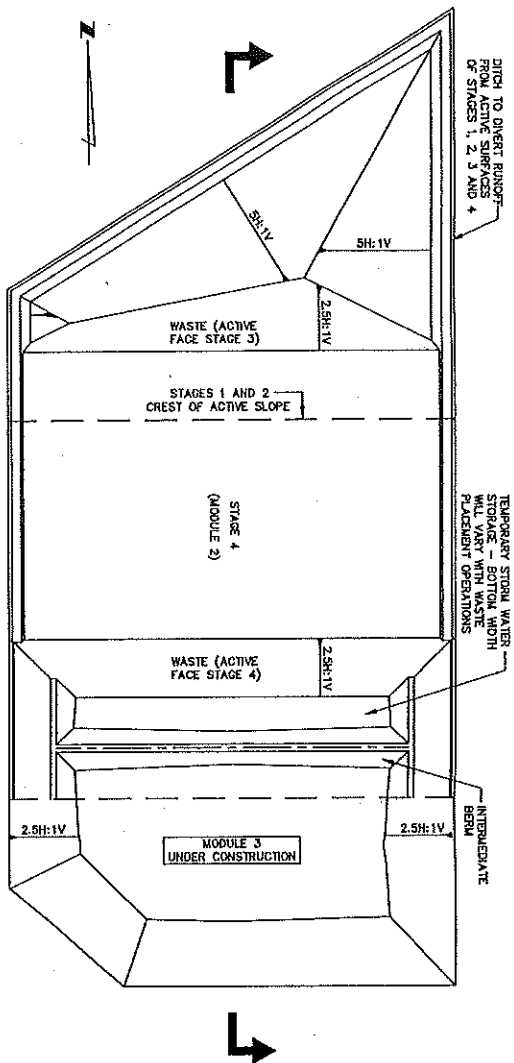
Houston, Texas

Chemical Waste Management, Inc.

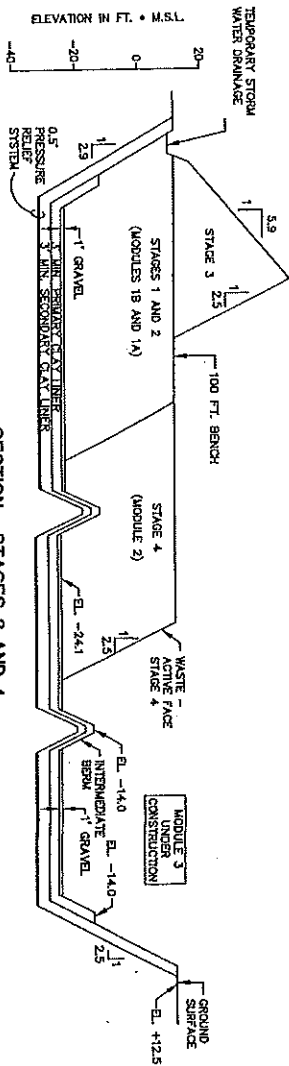
Oak Brook, Illinois 60521

PROJECT	LAKE CHARLES FACILITY			
	EPA I.D. NUMBER LAD000777201			
CELL 7	TYPICAL OPERATIONAL SEQUENCES 1 AND 2			
DRAWN	dhg	DATE	JANUARY 1995	JOB NO.
CHECKED	RP	SCALE	AS SHOWN	933-4177
REVIEWED	SM	FILE NO.	853-3197	738
				24

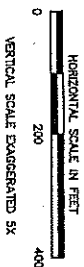
000622



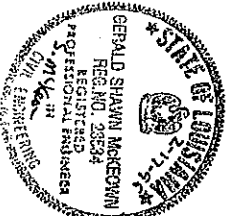
PLAN - STAGES 3 AND 4



SECTION - STAGES 3 AND 4



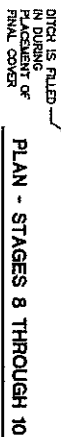
- NOTES:
1. OPERATIONAL SEQUENCES SHOWN ARE CONCEPTUAL IN NATURE.
  2. THE LOCATIONS OF THE RUN OFF PAVEMENT BERM AND DITCHES MAY VARY FROM THOSE SHOWN DEPENDING ON THE ACTUAL SEQUENCE OF WASTE PLACEMENT OPERATIONS.
  3. HALL ROADS FOR WASTE PLACEMENT ACCESS ARE NOT SHOWN FOR CONSTRUCTION LOCATIONS, LINES AND GRADES WILL VARY WITH EACH OPERATIONAL STAGE.



<b>Golder Associates</b>		Houston, Texas Chemical Waste Management, Inc. Oak Brook, Illinois 60061	
<b>CELL 7</b> <b>TYPICAL OPERATIONAL SEQUENCES 3 AND 4</b>			
PROJECT	LAKE CHARLES FACILITY		
PROJECT	EPA I.D. NUMBER LA0000777201		
DATE	JANUARY 1995	DWG. NO.	533-4177
SCALE	AS SHOWN	PAGE NO.	739
REVISION	5/4	PROJECT NO.	853-3197
			26

000623





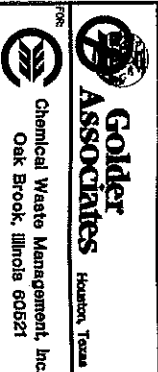
ELEVATION IN FT. • M.S.L.



SCALE IN FEET

0 200 400

VERTICAL SCALE EXAGGERATED 5X



## NOTES:

1. OPERATIONAL SEQUENCES SHOWN ARE CONCEPTUAL IN NATURE.
2. THE LOCATIONS OF THE RUN OFF DIVERSION BERMS AND DITCHES ARE TAKEN FROM THESE SHOWN DEPENDING ON THE ACTUAL SEQUENCE OF WASTE PLACEMENT OPERATIONS.
3. HALL, ROADS FOR WASTE PLACEMENT ACCESS ARE NOT SHOWN FOR CLARITY. THE LOCATIONS, LINES AND GRADES WILL VARY WITH EACH OPERATIONAL STAGE.

PROJECT LAKE CHARLES FACILITY  
EPA I.D. NUMBER LAD000777201

CELL 7  
TYPICAL OPERATIONAL  
SEQUENCES 8 THROUGH 10

SEARCHED	INDEXED	FILE NO.	JOB NO.
FILED	FILED	AS SHOWN	933-4177
DATE	SCALE	OWG. NO.	741
2/20	654	853-3197	741
			27

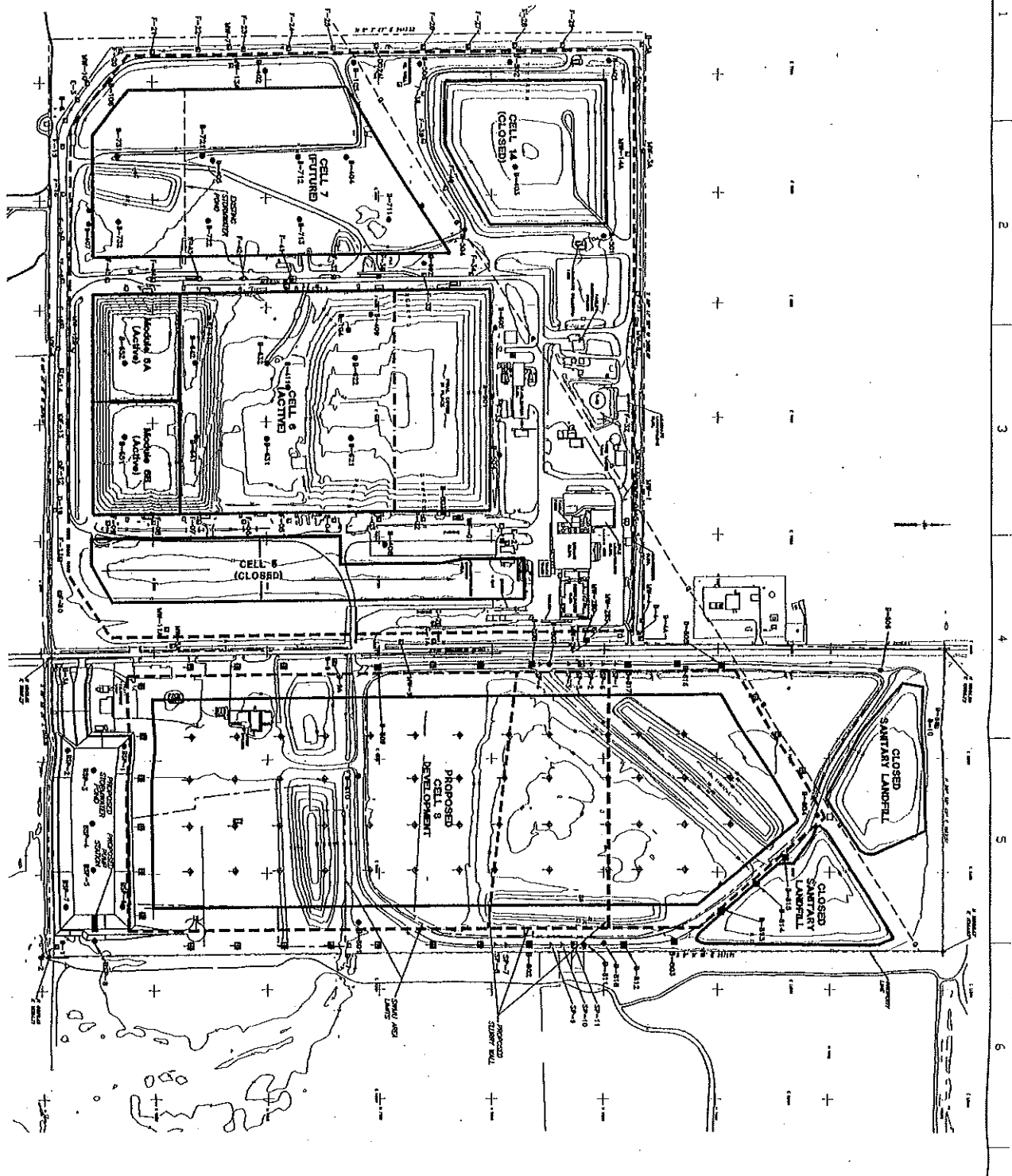
# **ATTACHMENT 12**

## **CONCEPTUAL DESIGN DRAWINGS FOR CELL 8**

**CONCEPTUAL DESIGN DRAWING:  
SUBJECT TO APPROVAL BY THE  
ADMINISTRATIVE AUTHORITY**

**NOTICE:**

000620



**LEGEND**

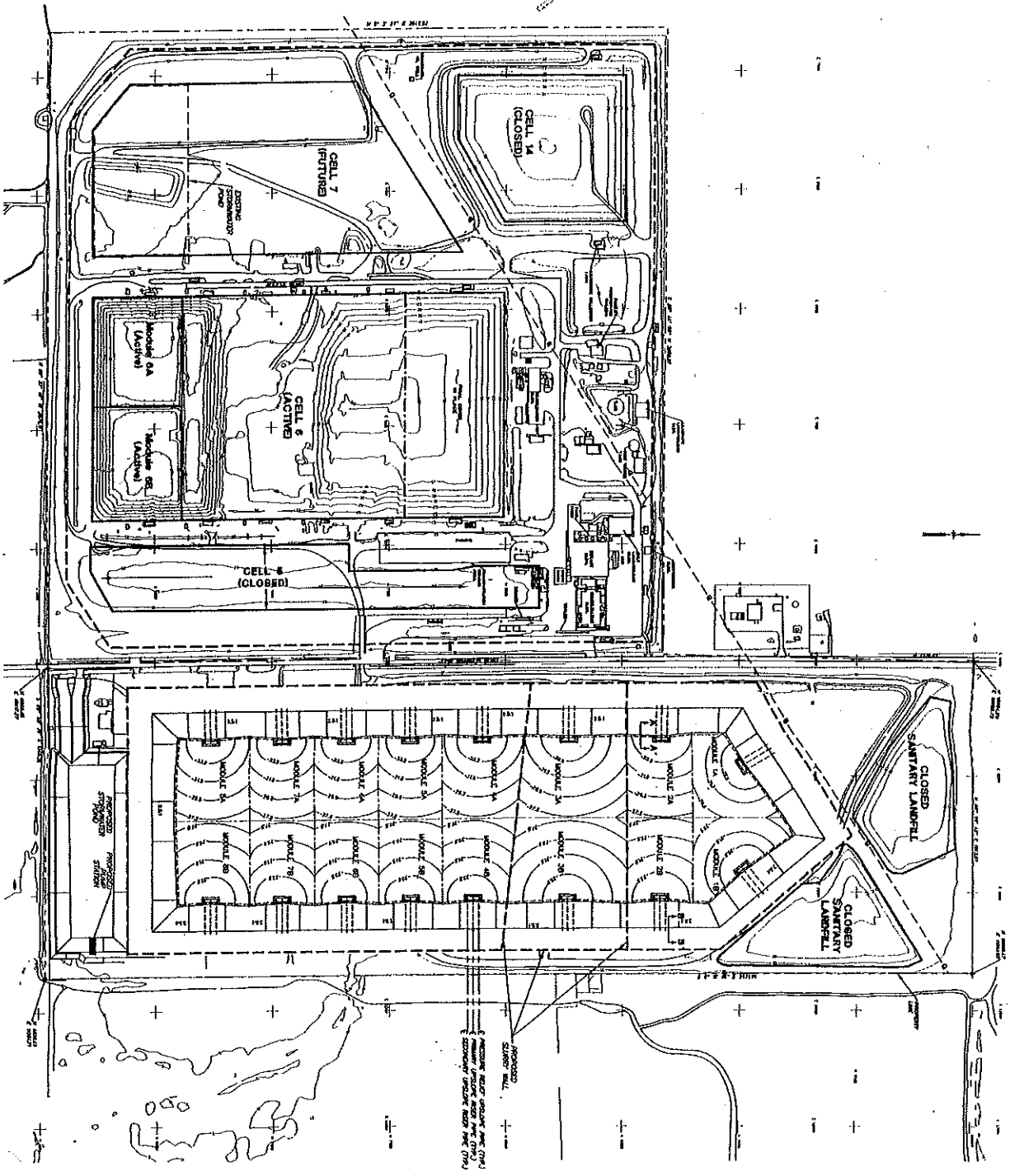
- FENCE LINE
- SLURRY WALL LOCATION
- BOREHOLE CELL LIMITS
- PROPERTY LINE
- HIGH PRESSURE GAS PIPELINE
- ABANDONED OIL WELL
- SHALY SAND LAYERS
- COMPLETED BORING LOCATION AND NUMBER
- PROPOSED BORING LOCATION AND NUMBER
- EXISTING MONITOR WELL
- EXISTING PRECINCTED WELL
- PROPOSED BORING LOCATION
- PROPOSED MONITOR WELL LOCATION

NOTE:  
1. THE GEOTECHNICAL INVESTIGATION BORING AND OBSERVATION MONITORING WELLS  
2. THE BORING LOCATIONS SHOWN INDICATE A PORTION OF THE STATE'S BORING LOCATIONS  
3. THE BORING LOCATIONS SHOWN INDICATE A PORTION OF THE STATE'S BORING LOCATIONS  
4. THE BORING LOCATIONS SHOWN INDICATE A PORTION OF THE STATE'S BORING LOCATIONS

**RST ENVIRONMENT &  
INFRASTRUCTURE**

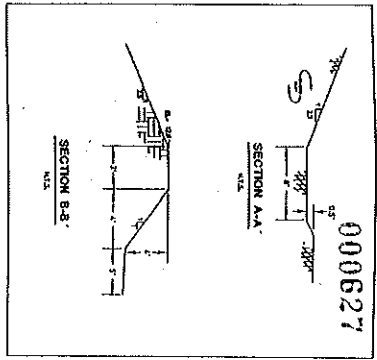
**CHEMICAL WASTE  
MANAGEMENT, INC.**

RE: BASE MAP PROVIDED BY CEMEX, WASTE MANAGEMENT, INC. AND BASED ON AERIAL PHOTOGRAPHY DATED 12/1/73.



**CONCEPTUAL DESIGN DRAWING;  
SUBJECT TO APPROVAL BY THE  
ADMINISTRATIVE AUTHORITY**

**NOTICE:**



**LEGEND**

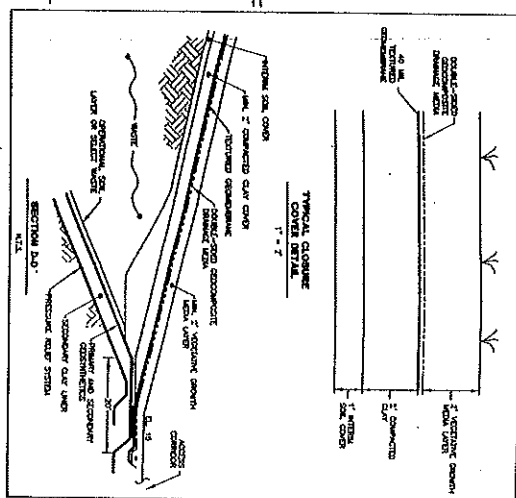
- POURING
- SLURRY WALL LOCATION
- ORIGINAL CELL LIMITS
- PROPERTY LINE
- IRON PILING AND PILE CAP
- ABANDONED DE WELL

**NOTES:**

1. ALL ELEVATIONS ARE IN FEET RELATIVE TO NATIONAL SEA LEVEL.
2. THE MOBILE ELEVATIONS SHOWN REPRESENT THE APPROXIMATE SURFACE OF THE EXCAVATION.
3. THE PLAN IS CONSIDERED THE ACTUAL CONSTRUCTION LOCATIONS. EXISTING UTILITIES SHOWN ARE BASED ON RECORD DRAWINGS. EXISTING UTILITIES NOT SHOWN ARE ASSUMED TO BE LOCATED AS SHOWN ON RECORD DRAWINGS.

<b>FAST ENVIRONMENT &amp; INFRASTRUCTURE</b>	
<b>CHEMICAL WASTE MANAGEMENT, INC.</b>	
<b>CELL 8 EXCAVATION PLAN</b>	
<b>803</b>	

**NOTICE:**




000623

NAME	DATE
DR. PETER CONRADSON	7/9-81
MR. BOHANNON	10/9-81
MR. ROBINSON	10/9-81
MR. O.	10/9-81
Phone No.	336-0410
C/O The Firm	336-0410

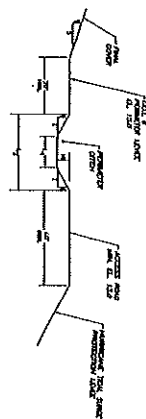
**RUST ENVIRONMENT & INFRASTRUCTURE**

CELL & CONCRETEAL DESIGN RESEARCH  
CIVIL&L VAST MANAGEMENT, INC.  
CASE CHAIRS FACILITY,  
CHARTERED COMPANY  
RD. 1B, LAWRENCEVILLE  
MAINT. TIME

 **CHEMICAL WASTE  
MANAGEMENT, INC.**  
CLD07

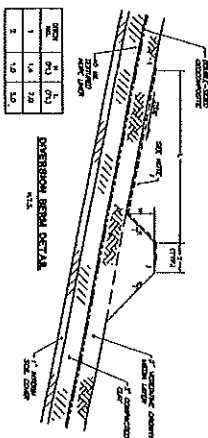


POLLUTANT: DITCH				
DITCH SECTION	H	L	P	S
A	1.1	3	3.4	
B	1.8	3	14.5	
C	3.0	3	31.0	
D	4.4	3	24.4	
E	1.8	3	14.2	
F	3.3	3	23.6	
G	3.4	3	30.8	



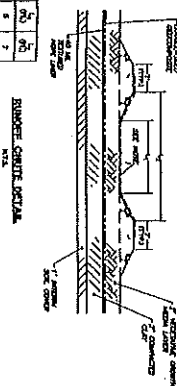
EXTENSION PERMETER CLEAR  
DISCONNECT, RUN-OFF POLISH DETAIL  
N.Y.C.

DRYER NO.	$\bar{M}_n$ (G)	$\bar{M}_w$ (G)
1	1.6	2.0
2	1.0	1.0



**OPERATIONAL BEHAVIOR SET/AS**

08	09	10	11
12	13	14	15
16	17	18	19
20	21	22	23



**PRINCE GEORGE DETAIL**

1. MINOR CRACKS AND DIRECTION BIRDS WILL BE REED WITH DIRECTION CONTROL MATERIAL.
2. ALL DIRECTION BIRDS LOCATED ON 25% SLOPE SHALL PROVIDE A MINIMUM GRADE OF 75 PER DIAMETER ACROSS THE SLOPE.

CONCEPTUAL DESIGN DRAWING;  
SUBJECT TO APPROVAL BY THE  
ADMINISTRATIVE AUTHORITY

### LEGEND

**ROMOFF LEFTDOWN CRUTE**

PHOTO DIVISION WORK LOCATION

1. ALL ELEVATIONS ARE IN FEET RELATIVE TO NATIONAL MEAN SEA LEVEL.
2. THE ELEVATIONS SHOW REPRESENT THE IMMEDIATE SURFACE OF THE PAUL CENTER VEGETATIVE GROWTH MEDIA LAYER.
3. THIS PLAN IS CONCEPTUAL IN NATURE. THE ACTUAL CONSTRUCTION LOCATION, ELEVATIONS, AND DETAILS MAY VARY FROM THESE SHOWN DETAILS DRAWINGS WILL BE DEVELOPED PRIOR TO CONSTRUCTION.

**FIRST**  
ENVIRONMENT &  
INFRASTRUCTURE

CELL & CONCEPTUAL DESIGN DELIVERING  
CHEMICAL PLANT MAINTENANCE, ETC.

LAKE CHARLES FACILITY  
CARTER, LOUISIANA  
EPA ID NO. LA0000772201  
PERMIT TITLE

**CHEMICAL WASTE  
MANAGEMENT, INC.**

**MANAGEMENT**  
SUPPORT

CELL 8  
SURFACE WATER

## MANAGEMENT PLAN



# **ATTACHMENT 13**

## **DIOXIN MANAGEMENT PLAN**

000632

**ATTACHMENT 13**  
**DIOXIN MANAGEMENT PLAN**

**DIOXIN MANAGEMENT PLAN**

1. The Permittee shall maintain a plan to manage dioxin containing wastes pursuant to LAC33.V.2523 and 40 CFR 264.317.
2. The facility's management plan summary is as follows:
  - a. CWMI is authorized to receive Hazardous Waste Codes F020, F021, F022, F023, F026, F027 and F028 as well as F039.
  - b. All ash with dioxin codes will have been treated by incineration in an approved incinerator meeting the requirements of 40 CFR 264.343(a)(2) and LAC33:V.3111.A.2.
  - c. All ash with dioxin codes will have been treated to meet the standards of 40 CFR 268.41 Table CCWE and LAC33:V.Chapter 22 Table 2.
  - d. All ash will be accompanied by a hazardous waste manifest and waste certification signed by the generator stating the ash has been properly treated and meets the treatment standards for dioxin waste codes.
  - e. The waste will be stored in tanks or containers as per LAC33:V.4437.A.2.
  - f. The landfill design meets the requirements of 40 CFR 264 Subpart N and LAC33:V.2503.K and LAC33:V.4512.A.
3. This management plan is written pursuant to LAC33:v.2523 and 40 CFR 264.317 Special Requirements for Hazardous Wastes F020, F021, F022, F023, F026 and F027 which is a requirement for permitted hazardous waste facilities.

The CWMI - Lake Charles Facility is authorized pursuant to state and federal laws to treat, store and dispose of hazardous waste. The principal activities at the existing site involve treatment and land disposal of hazardous waste. The facility is located on a 280 acre property owned by CWMI which is approximately eight-miles south-southwest of Sulphur, Louisiana near Carlyss in Calcasieu Parish. The facility address is 7170 John Brannon Road.

CWMI will receive containerized incinerator ash (baghouse dust and slag) which may be coded with one or a combination of the F020-F023, F026-F028 waste codes. The incinerators generating the ash must meet the requirements of 40 CFR 264.343(a)(2) and LAC33:V.3111.A.2; i.e., 99.9999 percent destruction and removal efficiency (DRE). The ash from the incinerator must meet the treatment standards for dioxin containing waste codes F020-F-23, F026-F028 required for land disposal before CWMI - Lake

Charles will accept the ash for disposal. These treatment standards are listed in 40 CFR 268.41 Table CCWE and LAC33:V.Chapter 22 Table 2.

Each shipment will be accompanied by a hazardous waste manifest and waste certification signed by the generator stating that the ash has been treated to meet the treatment standard for each dioxin code listed for the shipment. CWMI - Lake Charles will not perform any treatment on the ash to meet the treatment standards for the dioxin waste codes.

However, it should be noted that the incinerator ash may require additional treatment for waste codes. This treatment may be performed at CWMI - Lake Charles before the ash is landfilled. For example, the ash may require treatment using stabilization to meet a metal treatment standard before it can be landfilled.

As stated previously, after incineration of dioxin waste codes, the resulting incinerator ash will contain less than one part per billion (<1 ppb) of the dioxin constituents listed for each dioxin waste code. Also the required 99.9999 percent DRE for the incinerator operation will destruct other organic constituents that may have been in the original waste stream. The resulting ash will contain very small amounts of dioxin which is extractable (0.00064 oz/20 tons). The combination of extremely small amount of extractable dioxin remaining in the residue and the similarly small amount of organics available for extraction in the ash minimize the mobilization of the dioxin by constituents in the ash. Similarly other hazardous wastes which are listed or characteristic because of organics have treatment standards which require treatment to a standard before landfill disposal is permitted. The treatment standards as listed by EPA and LaDEQ were based on a safe level of exposure for land disposal.

The ash will be disposed in landfill cells at CWMI - Lake Charles which meet the minimum design standards for a Class C Hazardous Waste Landfill. This is a double composite liner design incorporating a 60 mil HDPE liner and three feet of clay with associated drainage networks in each composite layer. Leachate collection is automated and surface water pumps are used to remove ponded water from the landfill surface after rainfall accumulation. A similar collection system removes liquid from the secondary collection system. All liquids (surface water, leachate and secondary containment) removed from the cell are disposed in off-site underground injection wells. In addition, a forty foot deep slurry wall encircles the facility perimeter on the west side of John Brannon Road which includes the landfills.

In summary, the very small amount of dioxins in the ash, the increased incineration DRE reducing the organics in the ash, the limited levels of organics permitted in other landfill waste codes, the prohibition on landfilling of liquid waste, the landfill design and the offsite disposal of all liquids generated in the landfill each contribute to minimizing the possibility of dioxin exposure.

000635

# **RESPONSIVENESS SUMMARY**

**RESPONSIVENESS SUMMARY****CHEMICAL WASTE MANAGEMENT INC.****LAD 000 777 201****CARLYSS, LOUISIANA**

**ITEM:** 1

**REFERENCE:** January 28, 1996 correspondence from Michael Tritico.

**ISSUE:** Continued operation under Interim Status.

**COMMENT:** You have allowed Chemical Waste Management Inc. (CWMI) to continue to operate under the almost non-existent rules that predated the August 1989 date of the beginning of the Louisiana Hazardous Waste Management Plan.

**LDEQ RESPONSE:** During the course of the permit appeal, CWMI's Carlyss facility has been regulated under the interim status standards found in Louisiana's hazardous waste regulations.

Louisiana's interim status standards are based directly on the federal interim status standards found at 40 CFR 265. These standards have been in place since 1980 and are used to regulate hazardous waste treatment storage and disposal facilities across the nation.

Far from non-existent, interim status standards generally track the requirements that are ultimately imposed on permitted facilities. These requirements include financial assurance, waste analysis, emergency preparedness and prevention, personnel training, and groundwater monitoring.

Interim status standards were designed to govern the operation of hazardous waste treatment, storage, and disposal facilities until these facilities obtained final permits. Finalization of this settlement will result in the issuance of a final hazardous waste operating permit to CWMI allowing the LDEQ even greater regulatory control over the facility.

**ACTION:** The provisions of the proposed Settlement Agreement will not be revised.



000637

## **RESPONSIVENESS SUMMARY**

### **CHEMICAL WASTE MANAGEMENT INC.**

**LAD 000 777 201**

**CARLYSS, LOUISIANA**

**ITEM:** 2

**REFERENCE:** January 28, 1996 correspondence from Michael Tritico.

**ISSUE:** Intervenors were not allowed to comment on changes to the permit.

**COMMENT:** You appear to be allowing modifications to the proposed permit that go beyond what Intervenors were allowed to address during the hearings.

**LDEQ RESPONSE:** To properly regulate CWMI's Carlyss facility under a hazardous waste operating permit, it is necessary to ensure that the operating permit accurately reflects conditions at the facility.

The current draft permit has been revised to include items addressed in the 1989 permit as well as those changes made to the facility since the permit was appealed. All of these changes made during the permit appeal process were in accordance with the regulations governing interim status facilities and approved by the LDEQ.

In an effort to ensure that the public was allowed the opportunity to address the current version of the draft permit, the LDEQ issued a copy of the draft permit for public review and comment.

**ACTION:** The provisions of the proposed Settlement Agreement will not be revised.

**RESPONSIVENESS SUMMARY****CHEMICAL WASTE MANAGEMENT INC.****LAD 000 777 201****CARLYSS, LOUISIANA**

**ITEM:** 3

**REFERENCE:** January 28, 1996 correspondence from Michael Tritico.

**ISSUE:** Groundwater disputes.

**COMMENT:** The proposed settlement agreement is said to resolve groundwater disputes raised on appeal. Intervenor's were limited on addressing certain groundwater issues and we were not ever invited to any of the settlement negotiations, therefore, as far as I am concerned, the groundwater issues remain unresolved.

**LDEQ RESPONSE:** The proposed Settlement Agreement is the result of negotiations between LDEQ and CWMI to resolve groundwater issues and other issues, pursuant to an October 27, 1989 decision by the First Circuit Court of Appeal. This decision remanded the permit for settlement by negotiation between the LDEQ and CWMI.

**ACTION:** The provisions of the proposed Settlement Agreement will not be revised.

**RESPONSIVENESS SUMMARY****CHEMICAL WASTE MANAGEMENT INC.****LAD 000 777 201****CARLYSS, LOUISIANA**

**ITEM:** 4

**REFERENCE:** January 28, 1996 correspondence from Michael Tritico.

**ISSUE:** Buried river channel

**COMMENT:** One such issue was the buried river channel which traverses the existing landfill area from the northwest to the southeast, as we got one of CWMI's experts to testify from one of our U-2 infra-red aerial photographs fifteen years ago. That expert indicated that the channel's surface manifestation could be seen crossing John Brannon Road and going beneath the company property on the east side of the road. (Unless you have lost that USGS/NASA Certified Exhibit, you will still be able to see the buried river channel. It has not gone away.)

**LDEQ RESPONSE:** The site-specific geologic, stratigraphic and hydrogeologic conditions at the CWMI facility have been studied and documented by numerous geotechnical and hydrogeologic investigations. Additional borings, at 200 foot intervals, must be advanced in the Cell 8 development area prior to consideration and subsequent approval of a final detailed design for construction of Cell 8.

All required geologic, geotechnical and hydrogeologic data will be thoroughly evaluated by LDEQ prior to consideration and subsequent approval of a final design for Cell 8. At a minimum, Cell 8 will be constructed with a double composite liner system (with 2 synthetic and 2 recompacted clay liners), leachate collection and leak detection and removal systems, encompassing slurry wall, and will be hydrologically isolated from any stratigraphic units which may provide a preferential pathway for the migration of contaminants. In addition, monitoring wells will be installed in the "60-foot Sand" and the "Channel Sand" to monitor Cell 8 and to assess the integrity of the slurry wall. Proposed permitted requirements for design and construction of landfill cells is addressed in Section VIII of the proposed "Operating Permit".

**ACTION:** The provisions of the proposed Settlement Agreement will not be revised.

**RESPONSIVENESS SUMMARY****CHEMICAL WASTE MANAGEMENT INC.  
LAD 000 777 201  
CARLYSS, LOUISIANA**

**ITEM:** 5

**REFERENCE:** January 28, 1996 correspondence from Michael Tritico.

**ISSUE:** Interconnectivity of pervious strata.

**COMMENT:** Various pervious strata are hydraulically- interconnected vertically. If one stratum becomes contaminated, the poison will spread to the others.

**LDEQ RESPONSE:** Vertical interconnection does exist between permeable strata at the CWMI facility. This situation is common and is to be expected in fluvial sedimentary environments throughout the state of Louisiana. However, in order for downward vertical migration of groundwater to occur, a downward potentiometric gradient is required. Indeed, at the CWMI facility an upward vertical gradient exists. These hydrogeologic conditions tend to further reduce the possibility of any vertical migration of contaminants in the subsurface. Additionally, Landfill Cells 14, 6, 7, and 8 incorporate double composite liner systems (2 synthetic and 2 recompacted clay liners), Leachate Collection and Removal Systems, Leak Detection and Removal Systems, and an extensive groundwater monitoring system in order to ensure protection of human health and the environment.

**ACTION:** The provisions of the proposed Settlement Agreement will not be revised.

## RESPONSIVENESS SUMMARY

000641

### CHEMICAL WASTE MANAGEMENT INC. LAD 000 777 201 CARLYSS, LOUISIANA

ITEM: 6

REFERENCE: January 28, 1996 correspondence from Michael Tritico.

ISSUE: Intermixing of groundwater from various pervious strata.

COMMENT: We have seen evidence that some of the tombs [landfills] and the mixing areas have leaked contaminants into the shallow groundwater. We saw it in data available for the first hearing and we have seen more incriminating data since then.

We had testimony that salt from the Strategic Petroleum Reserve disaster was placed in the old cell and that such salt would cause an upward movement of water into the tomb, requiring vigorous removal of the leachate. That has happened, yet the Louisiana Department of Environmental Quality (DEQ) has not made the company remove the salt.

Instead, the company is being allowed to try something called a pressure relief system that was not talked about during the hearings and the company is being allowed to build the tombs much higher than the height that we were allowed to discuss during the adjudicatory hearings. If the extra height is an experimental technique for trying to slow the upward movement of the water table into the bases of the tombs, why is that not admitted and why has not DEQ required demonstration that such an approach will work without unexpected side effects, such as displacement of forces laterally to such a degree that the slurry wall will be ruined and the famous Gerald Walter "inward gradient" will be even more ludicrous than just a joke.

LDEQ RESPONSE: As evidenced by the results of groundwater monitoring at the CWMI facility, conducted pursuant to the Louisiana Hazardous Waste Regulations, no impact to groundwater at the CWMI facility has been documented. Additionally, there is no evidence that the presence of salt within the landfill cell would contribute to an "upward movement of water into the tomb (sic)".

**RESPONSIVENESS SUMMARY****CHEMICAL WASTE MANAGEMENT INC.****LAD 000 777 201****CARLYSS, LOUISIANA**

The pressure relief systems are constructed for the purpose of hydrologic control during construction of the landfill cells and have no impact on the production of leachate within the cells.

Final design configuration for Cells 6 and 7 were altered as changes under Interim Status pursuant to the Louisiana Hazardous Waste Regulations; these changes have no impact on groundwater movement. LDEQ approvals of these changes were based on review of detailed designs and calculations submitted to LDEQ by CWMI in order to ensure the integrity and long-term stability of the landfill cells and ensure protection of human health and the environment.

Preliminary geotechnical and hydrogeologic investigations have been performed for the Cell 8 development area and a conceptual design has been proposed. Additionally, a detailed geotechnical boring program, with borings at 200-foot intervals, will be required before the development of the detailed design for Cell 8. All required geologic, geotechnical, and hydrogeologic data will be thoroughly evaluated by LDEQ prior to consideration and subsequent approval of a final design for Cell 8.

**ACTION:**

The provisions of the proposed Settlement Agreement will not be revised.

**RESPONSIVENESS SUMMARY****CHEMICAL WASTE MANAGEMENT INC.****LAD 000 777 201****CARLYSS, LOUISIANA**

**ITEM:** 7

**REFERENCE:** January 28, 1996 correspondence from Michael Tritico.

**ISSUE:** Suitability of site levees.

**COMMENT:** Page 14 of exhibit 1 says that levees must be certified (by an independent Louisiana registered engineer) as capable of protecting the site from washouts, wave action, soil erosion, etc. I saw no such certification in the materials available for review.

More importantly, I think that no reputable engineer would give such a certification if he read the transcript of the adjudicatory hearing testimony of Dr. Shea Penland. Dr. Penland presented the National Hurricane Center's SLOSH Model computerized projections for what would happen at the site under various storm scenarios. It did not even take a category 4 or 5 storm to send the Gulf into the site. It was obvious from the model that a category 4 or 5 storm would tear the tomb walls and caps apart and spread hazardous all the way to Interstate 10 in Sulphur and Vinton, where the Gulf's water would not only have reached inland, but also would have risen to 27 feet above sea level at I-10, miles north of the site.

With the site five feet above sea level, sitting in a drained coastal marsh, how high would the levees have to be and how wide at their bases? We tried to ask that question during the hearing, but the hearing officer would not let us pursue the issue. What engineer has addressed it and certified that our concerns are pointless?

**LDEQ RESPONSE:** CWMI addressed floodplain protection and levee design in their Louisiana Hazardous Waste Regulations Part II Application, Volume V Appendix 31, submitted on January 11, 1988. In this appendix, a levee stability analysis report for the site was performed by Woodward Clyde Consultants. The LDEQ determined that the levee design was satisfactory and exceeded recommended safety factors for a 100-year flood, including the effects of wave action.

**ACTION:** The provisions of the proposed Settlement Agreement will not be revised.

## **RESPONSIVENESS SUMMARY**

000644

### **CHEMICAL WASTE MANAGEMENT INC.**

**LAD 000 777 201**

**CARLYSS, LOUISIANA**

**ITEM:** 8

**REFERENCE:** January 28, 1996 correspondence from Michael Tritico.

**ISSUE:** Deny the Settlement Agreement.

**COMMENT:** Since you have not conducted the Settlement Negotiations in a way that protects the legal rights of the public you therefore must not proceed with the Settlement as it is written. You must either deny the permit or rewrite the agreement or reconvene the adjudicatory hearings.

**LDEQ RESPONSE:** The LDEQ disagrees with the commentor's assertions that the legal rights of the public have not been protected. The resolution of the dispute between CWMI and LDEQ places CWMI's Carlyss facility under a final and enforceable hazardous waste operating permit. This permit is fully protective of human health and the environment.

**ACTION:** The provisions of the proposed Settlement Agreement will not be revised.



**RESPONSIVENESS SUMMARY****CHEMICAL WASTE MANAGEMENT INC.****LAD 000 777 201****CARLYSS, LOUISIANA**

**ITEM:** 9

**REFERENCE:** January 29, 1996 correspondence from Marvin L. Harger.

**ISSUE:** Objection to lack of public participation in the settlement agreement process.

**COMMENT:** I object to the Settlement Agreement between DEQ and CWMI. Although intervenors asked to be included in any discussions between DEQ and CWMI, we were never notified of any meetings to be held. We intervenors attended hearing conferences as well as days of hearings and other conferences during the hearing. When the hearing was concluded, a permit was legally issued by DEQ. The same subject matter was addressed in the hearings as those in most of the settlement agreement. While DEQ apparently covered their legal requirement by soliciting public input, they stopped short of allowing that input in its entirety, by changing many of the items issued in the permit without that public input, as well as adding many items during the negotiations (hearings) with CWMI, without the public input they had solicited. This not only cost us time, effort and money, but did not allow us to participate in all of the hearings. I thought we had a "Sunshine Law" in the state of Louisiana, or was that another pipe dream?

I think the DEQ is remiss in its failure to carry out the duties and responsibilities as the supposed regulatory agency specifically set up to protect the Health and Environment of the citizens of Louisiana, and hereby request immediate correction of those failures by a denial of the settlement agreement

DEQ has a transcript of the 1988 hearings regarding the permit for CWMI. I will not bore you with the details, but suggest that the DEQ compare the permit issued as a result of those hearings with the Proposed Settlement Agreement, while keeping in mind that the hearing officer was empowered to only suggest changes to the Secretary of DEQ, and did not have the authority to dictate the permit or conditions that the Secretary had to agree with. Otherwise, he would have been a superior to the Secretary and probably would not have been employable by the Secretary. Nevertheless, it seems to me that CWMI was the one who paid for the services of the Hearing

**RESPONSIVENESS SUMMARY****CHEMICAL WASTE MANAGEMENT INC.  
LAD 000 777 201  
CARLYSS, LOUISIANA**

Officer, although that procedure, I believe has been changed. Any additions made to that permit should either be deleted or conducted in hearings with the attendance of the intervenors present and allowed to participate, just as they did in the original part of the hearing.

**LDEQ RESPONSE:**

This settlement resolves CWMI's appeal of permit conditions imposed by the LDEQ in the (original) 1989 permit. Those parties who intervened in the hearings held prior to the issuance of the 1989 CWMI permit were not parties to this appeal.

In order to accomplish the ultimate resolution of CWMI's permit appeal, it was necessary to revise the final operating permit to reflect current conditions at the facility. Without these changes, the permit would have been an out-of-date and ineffective regulatory tool. All of the changes to the facility made during the permit appeal process and incorporated into the revised permit were made in accordance with LDEQ interim status regulations and approved by the Department.

Public input into the resolution of the appeal, including all provisions of the updated permit, was solicited by the LDEQ. As part of the settlement process, the LDEQ gave public notice of, and invited comments on, the proposed settlement agreement and accompanying draft permit.

**ACTION:**

The provisions of the proposed Settlement Agreement will not be revised.

**RESPONSIVENESS SUMMARY****CHEMICAL WASTE MANAGEMENT INC.  
LAD 000 777 201  
CARLYSS, LOUISIANA**

**ITEM:** 10

**REFERENCE:** January 29, 1996 correspondence from Marvin L. Harger.

**ISSUE:** CWMI is located in a floodplain.

**COMMENT:** DEQ continues to disregard their obligation to the health and environment of Louisiana citizens by allowing the continued alterations and expansions to the referenced CWMI facility at John Brannon Road, Carlyss, Calcasieu Parish, Louisiana (the Facility). That facility is located in an area that is forbidden by the United States Environmental Protection Agency (USEPA) regulations. Those regulations forbid the location of a hazardous waste treatment, storage, and disposal (TSD) facility as follows:

A TSD can not be located in a floodplain. The CWMI Carlyss site is in a floodplain, with portions of the site only five (5) feet above Mean Sea Level.

**LDEQ RESPONSE:** Federal and State hazardous waste regulations do not forbid the location of a TSD in a 100-year floodplain. However, special procedures must be followed if a facility is located in a floodplain. Specifically, LAC 33:V.517.T.2.b states:

"b. Owners and operators of facilities located in the 100-year floodplain must provide the following information:

- i. the 100-year flood level and any other special flooding factors (e.g., wave action) which must be considered in designing, constructing, operating, or maintaining the facility to withstand washout from a 100-year flood;
- ii. engineering analysis to indicate the various hydrodynamic and hydrostatic forces expected to result at the site as a consequence of a 100-year flood;
- iii. structural or other engineering studies showing the design of operational units (e.g., tanks, incinerators) and flood protection devices (e.g., floodwalls, dikes) at the facility and how these will prevent washout;

## RESPONSIVENESS SUMMARY

000648

### CHEMICAL WASTE MANAGEMENT INC.

LAD 000 777 201

CARLYSS, LOUISIANA

iv. if applicable, and in lieu of the above two provisions, a detailed description of procedures to be followed to remove hazardous waste to safety before the facility is flooded, including:

v. timing of such movement relative to flood levels, including estimated time to move the waste, showing that such movement can be completed before floodwaters reach the facility;

vi. a description of the location(s) to which the waste will be moved and demonstration that those facilities will be eligible to receive hazardous waste in accordance with LAC 33:V.Subpart 1;

vii. the planned procedures, equipment, and personnel to be used and the means to ensure that such resources will be available in time for use; and

viii. the potential for accidental discharges of the waste during movement."

CWMI has addressed this regulation by constructing a perimeter levee system around the facility. The design requirements for this levee system were addressed in CWMI's Louisiana Hazardous Waste Regulations Part II Application, Volume V, Appendix 31, submitted on January 11, 1988. The information provided adequately demonstrates compliance with LAC 33:V.517.T.2.b.

In addition, the LDEQ addressed these concerns in the draft permit. Section II.H.2 of the draft permit states:

"The permittee shall not place any hazardous waste unit on any portion of the property that lies within the 100 year floodplain (as identified in the Flood Insurance Rating Map) unless such areas are raised above this flood level or other means (e.g., levees) are provided to protect such areas from washouts, overtopping by wave action, soil erosion or other effects of such a flood as required by LAC 33:V.1503.B.3. Such site improvements shall be certified by an independent Louisiana registered engineer and approved by LDEQ

000649

**RESPONSIVENESS SUMMARY**

**CHEMICAL WASTE MANAGEMENT INC.**

**LAD 000 777 201**

**CARLYSS, LOUISIANA**

prior to any hazardous waste and/or hazardous waste facilities being placed thereon."

**ACTION:**

The provisions of the proposed Settlement Agreement will not be revised.

**RESPONSIVENESS SUMMARY**

000650

**CHEMICAL WASTE MANAGEMENT INC.  
LAD 000 777 201  
CARLYSS, LOUISIANA**

**ITEM:** 11

**REFERENCE:** January 29, 1996 correspondence from Marvin L. Harger.

**ISSUE:** CWMI is located in an area where irrigation canals occur.

**COMMENT:** DEQ continues to disregard their obligation to the health and environment of Louisiana citizens by allowing the continued alterations and expansions to the referenced CWMI facility at John Brannon Road, Carlyss, Calcasieu Parish, Louisiana (the Facility). That facility is located in an area that is forbidden by the United States Environmental Protection Agency (USEPA) regulations. Those regulations forbid the location of a hazardous waste treatment, storage, and disposal (TSD) facility as follows:

A TSD cannot be located in an area where irrigation canals occur. (The CWMI Carlyss site is so located.) In fact, a 500 foot deep, 10 inch diameter irrigation well with canals is located within 100 feet of the southern boundary, down gradient, of the site.

**LDEQ RESPONSE:** Neither State nor Federal hazardous waste regulations forbid the location of a TSD in an area where irrigation canals occur.

**ACTION:** The provisions of the proposed Settlement Agreement will not be revised.

## RESPONSIVENESS SUMMARY

000051

### CHEMICAL WASTE MANAGEMENT INC. LAD 000 777 201 CARLYSS, LOUISIANA

ITEM: 12

REFERENCE: January 29, 1996 correspondence from Marvin L. Harger.

ISSUE: CWMI is located in an area where active faulting occurs.

COMMENT: DEQ continues to disregard their obligation to the health and environment of Louisiana citizens by allowing the continued alterations and expansions to the referenced CWMI facility at John Brannon Road, Carlyss, Calcasieu Parish, Louisiana (the Facility). That facility is located in an area that is forbidden by the United States Environmental Protection Agency (USEPA) regulations. Those regulations forbid the location of a hazardous waste treatment, storage, and disposal (TSD) facility as follows:

A TSD cannot be located in an area where active faulting occurs. The CWMI Carlyss site is located almost directly (if not directly) above a portion of a fault named the "Lake Arthur Fault" and shown on most geologic maps of this area. Although CWMI claimed that the fault is not active, an earthquake occurred on the fault in 1984, with an epicenter approximately two (2) miles from the CWMI site. While the Richter scale of 2.8 is not considered to be dangerous, it did demonstrate that "active faulting" occurs here. It may not compare to quakes in the San Andreas fault, it does demonstrate activity.

LDEQ RESPONSE: The Louisiana Hazardous Waste Regulations prohibit the location of a TSD facility within 200 feet of a fault which has had displacement in Holocene time. The fault in question is a deep subsurface fault which occurs almost 3000 feet south of the CWMI facility and does not extend to the shallow subsurface. Documentation of compliance with the seismic standard has been submitted to LDEQ by CWMI pursuant to the permitting process and settlement negotiations.

ACTION: The provisions of the proposed Settlement Agreement will not be revised.

## RESPONSIVENESS SUMMARY

000652

### CHEMICAL WASTE MANAGEMENT INC. LAD 000 777 201 CARLYSS, LOUISIANA

ITEM: 13

REFERENCE: January 29, 1996 correspondence from Marvin L. Harger.

ISSUE: The LDEQ should have limited CWMI to original permitted limits.

COMMENT: While the CWMI site at Carlyss may have been considered to be "Grandfathered in", continued expansion should not be allowed. For example, CWMI had indicated in prior permit applications that the site would have a lifetime of only 21 years, with an average of 100,000 tons per year of waste deposits. DEQ has allowed an increase of elevation of deposition of waste from two (2) feet below ground surface to be increased to almost 100 feet above ground surface. That allows a tremendous increase in the amount of wastes plus greater danger of erosion in an area that was already forbidden for TSD facilities. The least DEQ should have done was to allow only the original representations or estimations of amounts, depths and elevations.

LDEQ RESPONSE: CWMI's Carlyss facility was in existence prior to the implementation of the hazardous waste regulations. As a result the facility was granted interim status. Under this regulatory scheme the CWMI facility was, in a sense "grandfathered in." Interim status is not, however, intended simply to allow a limited continuation of activities that would otherwise be prohibited.

Certain changes to interim status facilities are anticipated by the hazardous waste regulations. It is up to the LDEQ to evaluate each proposed change and determine whether or not these changes are acceptable and meet applicable regulatory standards.

The fact that a facility pre-existed the regulations and/or was "grandfathered in" has no impact on what future changes might take place at the facility. Hazardous waste treatment, storage or disposal facilities often undergo changes to keep up with waste management trends and technology. However, all such changes are governed by the hazardous waste regulations and subject to Department approval.

ACTION: The provisions of the proposed Settlement Agreement will not be revised.



## RESPONSIVENESS SUMMARY

**CHEMICAL WASTE MANAGEMENT INC.  
LAD 000 777 201  
CARLYSS, LOUISIANA**

000653

**ITEM:** 14

**REFERENCE:** January 29, 1996 correspondence from Marvin L. Harger.

**ISSUE:** Title deed for CWMI.

**COMMENT:** The Settlement Agreement states in Section 1. "Chemical Waste is the owner and operator of a hazardous waste treatment, storage and disposal facility at John Brannon Road, Carlyss, Calcasieu Parish, Louisiana ("the Facility"). This aptly demonstrates the acceptance by DEQ of anything that CWMI states to DEQ. CWMI stated in a notarized affidavit dated 19 October, 1983, to the Clerk of Court in the parish of East Baton Rouge, State of Louisiana, that "Chemical Waste Management, Inc., a foreign corporation authorized to do and doing business in the State of Louisiana appearing herein through its duly authorized agent and attorney, who after being duly sworn, did acknowledge and declare that:

"Chemical Waste Management is the owner of a certain tract or parcel of ground described as follows: A certain tract or parcel of ground containing approximately 280 acres, located in Sections 8 and 9 of Township 11 South, Range 10 West, located in the Parish of Calcasieu, State of Louisiana and which said tract is divided by John Brannon so that 160 acres is west of John Brannon Road and 120 acres is east of John Brannon Road."

DEQ could (and should) check the land records in Calcasieu Parish to determine whether or not the above affidavit is true.

**LDEQ RESPONSE:** On March 15, 1996, members of the LDEQ's Hazardous Waste Division visited the Calcasieu Parish Clerk of Court's office to perform a title deed search on the CWMI property. The only significant difference noted between the affidavit and the deeds of sale was that the deeds of sale, dated approximately three years earlier than the affidavit, list CWMI as a Delaware corporation rather than a foreign corporation authorized to do business in the State of Louisiana.

**ACTION:** The provisions of the proposed Settlement Agreement will not be revised.

## **RESPONSIVENESS SUMMARY**

**CHEMICAL WASTE MANAGEMENT INC.  
LAD 000 777 201  
CARLYSS, LOUISIANA**

000654

**ITEM:** 15

**REFERENCE:** January 29, 1996 correspondence from Marvin L. Harger.

**ISSUE:** The LDEQ should verify all information.

**COMMENT:** DEQ should verify all of the statements, representations, and data presented by CWMI to the department to assure the accuracy of them.

**LDEQ RESPONSE:** The LDEQ reviews all permit applications. During this process, the information submitted by the applicant is reviewed for accuracy and technical adequacy. Throughout the application and permitting process, the applicant must sign certifications stating:

"I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment." (LAC 33:V.513)

In addition, Section I of the draft permit, the Preamble, states:

"This permit is based on information submitted in the permit application, and all subsequent submittals, and on the applicant's certification that such information is accurate and that all facilities were or will be constructed and operated as specified in the application."

The above regulation and preamble condition demonstrate the LDEQ's commitment to assuring the accuracy of information submitted. If any applicant knowingly falsifies information, not only would the permit be in jeopardy of being revoked, the responsible party could face fines and imprisonment.

**ACTION:** The provisions of the proposed Settlement Agreement will not be revised.

**RESPONSIVENESS SUMMARY**

000655

**CHEMICAL WASTE MANAGEMENT INC.**

**LAD 000 777 201**

**CARLYSS, LOUISIANA**

**ITEM:** 16

**REFERENCE:** The LDEQ must be a responsible agency.

**ISSUE:** January 29, 1996 correspondence from Marvin L. Harger.

**COMMENT:** DEQ must become a truly responsible agency as required by Louisiana and Federal laws, with public input and public accountability. Otherwise, the agency should simply be done away with by the legislature that created it.

**LDEQ RESPONSE:** Authorization for Louisiana to administer its Hazardous Waste Program has been given by the USEPA. In order to maintain this authorization, the LDEQ must remain consistent with the federal program administered by the USEPA, all under that agency's oversight. If the USEPA finds that the LDEQ is acting in a irresponsible manner, the USEPA can revoke the LDEQ's authority.

The regulations followed by the LDEQ are the result of promulgation of State regulations which are at least equivalent to, and in some cases more stringent than, those followed by the U.S. EPA. These regulations have evolved over a 13+ year process and are used nationwide in the regulation of hazardous waste facilities.

**ACTION:** The provisions of the proposed Settlement Agreement will not be revised.

## RESPONSIVENESS SUMMARY

000656

**CHEMICAL WASTE MANAGEMENT INC.  
LAD 000 777 201  
CARLYSS, LOUISIANA**

ITEM: 17

REFERENCE: February 5, 1996 correspondence from LEAN (Louisiana Environmental Action Network).

ISSUE: Use of Practical Quantitation Limits (PQLs) and Method Detection Limits (MDLs) in the permit.

COMMENT: The proposed settlement agreement permit's use of practical quantitation limits for groundwater monitoring of volatile organic compounds is improper.

In Section X of the proposed settlement agreement permit ("proposed permit"), the Groundwater Monitoring section, Practical Quantitation Limits ("PQLs") are listed for each volatile organic indicator parameter in Table 3A. The DEQ indicates that the PQL values listed are based on a report or article by Robert D. Gibbons. We object to the use of the PQLs as listed in this table for several reasons.

1. The DEQ's adoption of the practical quantitation limits listed in Table 3A in place of the method detection limits has no basis in the record.

In the DEQ's original permit issued to CWMI, limits for volatile organics were set as concentration limits and method detection limits ("MDLs"). This was in accord with the regulatory requirements. The Louisiana Administrative Code 33:V.3309 requires that "[t]he administrative authority ... specify in the facility permit concentration limits in the groundwater for hazardous constituents." It also requires that any statistical method used to evaluate groundwater monitoring data "shall account for data below the limit of detection with one or more statistical procedures that are protective of human health and the environment." (LAC 33:V.3315.1.5) Thus the DEQ originally determined that use of MDLs in the statistical procedure would account for data below the limit of detection and would satisfy this regulatory requirement.

In the proposed permit, however, the DEQ has approved a monitoring method which does not use MDLs (although MDL values are superfluously listed in the table) or set concentration limits. The

## **RESPONSIVENESS SUMMARY**

### **CHEMICAL WASTE MANAGEMENT INC.**

**LAD 000 777 201**

**CARLYSS, LOUISIANA**

proposed method uses PQLs instead. Although the use of PQLs is sanctioned in the regulations, the PQLs must meet the regulatory requirements that "Any practical quantitation limit (PQL) approved by the administrative authority ... shall be the lowest concentration level that can be reliably achieved within specified limits of precision and accuracy during routine laboratory operating conditions that are available to the facility." (LAC 33:V.3315.I.5)

The record does not reflect that the DEQ has determined that or even considered whether the PQLs listed in Table 3A of the proposed permit are the lowest concentration levels that can be achieved. The absence of any showing of this in the record is particularly suspect when the DEQ originally stated in its brief that MDL is the "acceptable reproducible concentration limit that can be detected by an analytical instrument." (See original brief on behalf of the Louisiana Department of Environmental Quality in the Matter of Chemical Waste Management, Inc., Case No. CA/90/05/16, First Circuit Court of Appeal.) In fact, because the PQL values now listed for volatile organics are higher than the MDL for all but two of the listed volatiles, it would appear on its face that the PQLs are not the "lowest concentration limit that can be reliably achieved."

Thus, we object to the adoption of the listed PQLs absent a showing by the DEQ of how it has now determined that PQLs, and not MDLs, are the lowest concentration that can be reliably achieved.

Although Method Detection Limits, MDLs, are listed in Table 3A of the permit, these are apparently either an artifact of the original permit or simply window dressing because nowhere in the language of the groundwater monitoring section of the permit are these values referred to, nor are they used in the monitoring framework set up in the permit.

#### **LDEQ RESPONSE:**

LDEQ has conducted extensive in-house reviews of the statistically derived PQLs which are specified in the proposed Settlement Agreement. A review of the latest literature, EPA Guidance documents, and discussion with numerous experts in the field (including the author of the RCRA regulations pertaining to statistical analysis of groundwater monitoring) indicate that for a facility such as CWMI (*i.e.* a facility at which groundwater monitoring data

## **RESPONSIVENESS SUMMARY**

000658

### **CHEMICAL WASTE MANAGEMENT INC.**

**LAD 000 777 201**

**CARLYSS, LOUISIANA**

consists of a large proportion of nondetects), the proposed approach is one of the few viable approaches for satisfying the statistical analysis requirements under the federal regulations and the Louisiana Hazardous Waste Regulations. Additionally, LDEQ-HWD contracted Tulane University Medical Center, School of Public Health and Tropical Medicine, to perform an independent review of the proposed statistical method. The results of this review were taken into consideration during preparation of permit provisions regarding groundwater monitoring. Documentation of the rationale for the proposed statistical methods and compliance with applicable regulations has been submitted to LDEQ by CWMI pursuant to settlement negotiations.

The Method Detection Limits listed in Table 3A of the permit are for informational purposes only. The Method Detection Limit, as defined in "Test Methods for Evaluating Solid Waste" (USEPA SW-846, Third Edition, Revision 1), is the minimum concentration of a substance that can be measured and reported with 99% confidence that the analyte concentration is greater than zero and is determined from analysis of a sample in a given matrix containing the analyte (emphasis added). The Practical Quantitation Limit (PQL) is defined as the lowest level that can be reliably achieved within specified limits of precision and accuracy during routine laboratory operating conditions. For a groundwater matrix, the PQL is generally 5 to 10 times the MDL.

#### **ACTION:**

The provisions of the proposed Settlement Agreement will not be revised.

## RESPONSIVENESS SUMMARY

CHEMICAL WASTE MANAGEMENT INC.

LAD 000 777 201

CARLYSS, LOUISIANA

000659

ITEM: 18

REFERENCE: February 5, 1996 correspondence from LEAN (Louisiana Environmental Action Network).

ISSUE: Analytical requirements for groundwater monitoring have no basis in the record.

COMMENT: The proposed settlement agreement permit's use of practical quantitation limits for groundwater monitoring of volatile organic compounds is improper.

In Section X of the proposed settlement agreement permit ("proposed permit"), the Groundwater Monitoring section, Practical Quantitation Limits ("PQLs") are listed for each volatile organic indicator parameter in Table 3A. The DEQ indicates that the PQL values listed are based on a report or article by Robert D. Gibbons. We object to the use of the PQLs as listed in this table for several reasons.

2. The DEQ's adoption of the "Robert D. Gibbons" statistical method is unsupported in the record.

In the proposed permit, a determination that contaminants are present in the groundwater is only made if the groundwater sample yields a result greater than the PQL listed. For volatile organics, these PQL values were statistically determined based on a method by Robert D. Gibbons.

The regulations provide several types of statistical methods which can be used to evaluate groundwater data. (LAC 33:V.3315.H). However, the regulations mandate that "[u]se of any of the following statistical methods must be protective of human health and the environment and must comply with the performance standards outlined in LAC 33:V.3315.I."

The DEQ has provided no basis in the record to conclude that the Gibbons method is protective of human health and the environment or complies with the required performance standards. Several issues are of concern regarding the Gibbons method.

## **RESPONSIVENESS SUMMARY**

000660

### **CHEMICAL WASTE MANAGEMENT INC.**

**LAD 000 777 201**

**CARLYSS, LOUISIANA**

First, nowhere in the permit or in any attachment to the permit is the Gibbons statistical method reproduced, explained, summarized, or discussed. Second, this method appears not to be a widely used or accepted industry standard, unlike the Student t-test method recommended in the original permit. In fact, the cite provided in the permit to the authority for this method is not any scientific journal or well-known industry literature. The citation is so cryptic as to make it impossible to locate this article, speech, or whatever form this method was memorialized in. Third, it was a method developed by Robert D. Gibbons that was originally proposed by CWMI and rejected by the DEQ. If this is in fact the same method, the agency has given no reasons why its original valid objections to this method, including its reliance on comparison of a sample to only the previous sample no longer exist. If in fact this method is based on comparing the sample taken to only the previous sample, then it may violate the regulatory requirement that "these method(s) must compare data collected at the compliance point(s) to the background groundwater quality data." (LAC 33:V.3317.F.1.) As envisioned by the regulations, background groundwater quality data would be that which exists originally.

Thus, the DEQ must provide a basis for approving a statistical method which it originally rejected as not being adequate protection to human health and the environment.

#### **LDEQ RESPONSE:**

The scientific community, as well as the USEPA, has long recognized that statistical tests, such as the Student's t-test, which are based on the assumption that data is normally distributed, may not be applicable to many groundwater monitoring applications. Indeed, the USEPA has revised its regulations to allow for more flexibility in the selection of statistical methods to account for this fact. Each groundwater monitoring application is characterized by a unique set of conditions which must be taken into account before selection of an appropriate statistical method. LDEQ has considered such site-specific conditions, as well as the most up-to-date scientific publications and consultation with professional statisticians, in proposing the terms of this Settlement Agreement.

The methodology by which the statistically derived PQLs are developed is well documented. In his book "Statistical Methods for



**RESPONSIVENESS SUMMARY**

000661

**CHEMICAL WASTE MANAGEMENT INC.**

**LAD 000 777 201**

**CARLYSS, LOUISIANA**

Groundwater Monitoring", Robert Gibbons provides detailed discussion of the proposed method, along with an extensive bibliography of technical and scientific references. Additionally, as stated in the response to Comment No. 18 above, documentation of the rationale for the proposed statistical methods and compliance with applicable regulations has been submitted to LDEQ by CWMI pursuant to settlement negotiations.

**ACTION:**

The provisions of the proposed Settlement Agreement will not be revised.

**RESPONSIVENESS SUMMARY**

000662

**CHEMICAL WASTE MANAGEMENT INC.  
LAD 000 777 201  
CARLYSS, LOUISIANA**

**ITEM:** 19

**REFERENCE:** February 5, 1996 correspondence from LEAN (Louisiana Environmental Action Network).

**ISSUE:** Background groundwater variables should not be made variable.

**COMMENT:** Background variables should not be made variable.

In the groundwater section of the proposed permit, page 55, the permit provides that "background values and PQLs for indicator parameters ... will be updated with additional data as it becomes available." This is improper. A background value is immutable and is the value that exists originally at the site.

**LDEQ RESPONSE:** Background values are not "immutable values that exist originally at the site". Background groundwater parameters are subject to temporal variation which may be caused by natural and/or anthropogenic processes unrelated to operations at the CWMI facility. In order to account for these variations and to characterize background water quality at the time of sampling, groundwater quality at the upgradient background wells is compared to groundwater quality at the downgradient point of compliance wells. The results of groundwater monitoring from both the upgradient wells and the point of compliance wells must be evaluated in order make a determination as to whether potential changes in water quality at the point of compliance are the result of a release associated with the CWMI facility.

**ACTION:** The provisions of the proposed Settlement Agreement will not be revised.

## **RESPONSIVENESS SUMMARY**

**CHEMICAL WASTE MANAGEMENT INC.  
LAD 000 777 201  
CARLYSS, LOUISIANA**

000663

**ITEM:** 20

**REFERENCE:** February 5, 1996 correspondence from LEAN (Louisiana Environmental Action Network).

**ISSUE:** The DEQ should keep the original approach to the groundwater monitoring requirements.

**COMMENT:** We object to the groundwater monitoring section of the permit as it currently existed and request that the DEQ adopt its original approach to the above-stated problems.

**LDEQ RESPONSE:** Findings of fact, conclusions of law, and recommendations which were made by the hearing officer in connection with the September 1988 adjudicatory hearing cite numerous provisions of the groundwater protection section of the appealed Operating Permit that are without technical or legal basis. Based on these findings of fact, conclusions of law, and recommendations, appealed groundwater issues were remanded to LDEQ for settlement through negotiations with CWMI. The groundwater protection provisions of this settlement agreement reflect these negotiations, are technically sound, and are in full compliance with the Louisiana Hazardous Waste Regulations.

**ACTION:** The provisions of the proposed Settlement Agreement will not be revised.

000664

# **RESPONSIVENESS SUMMARY**

## **APPENDIX 1**

### **LAND TITLE DEEDS AND AFFIDAVIT**

37 15  
CONVEYANCE

000665 6-75  
eky

OFFICE OF THE CLERK OF COURT  
CASH SALE NOV 20 1980  
CALCASIEU PARISH, LOUISIANA

MALCOLM PAUL RICHARD, ET UX UNITED STATES OF AMERICA  
TO STATE OF LOUISIANA  
CHEMICAL WASTE MANAGEMENT, INC. PARISH OF CALCASIEU

BEFORE US, the undersigned authorities, in and for the states,  
counties and/or parishes hereinafter shown, and on the dates indicated,  
personally came and appeared:

MALCOLM PAUL RICHARD, of lawful age and a resident of the Parish  
of Calcasieu, State of Louisiana, married to and residing with  
Joan Reich Richard, born Reich, and the said

JOAN REICH RICHARD, born Reich,

herein called SELLERS, residents of the Parish and State aforesaid, whose  
permanent mailing address is declared to be Route 2, Box 1935, Sulphur,  
Louisiana 70663, who declared that for the price of SEVENTY THOUSAND AND NO/100  
(\$70,000.00) DOLLARS cash, receipt of which is acknowledged, SELLERS hereby  
sell and deliver with full warranty of title and subrogation to all rights  
and actions of warranty SELLERS may have, unto:

CHEMICAL WASTE MANAGEMENT, INC., a Delaware corporation, authorized  
to do business in the Parish of Calcasieu, State of Louisiana,  
herein represented by its duly authorized Senior Vice-President,  
Lawrence Beck

herein called BUYER,

whose permanent mailing address is declared to be 900 Jorie Boulevard, Oak  
Brook, Illinois, 60521, the following described property the possession  
and delivery of which BUYER acknowledges, said property being situated in the  
Parish of Calcasieu, State of Louisiana, to-wit:

Commencing at a point 656.42 feet South of the Northeast Corner  
of the Northeast Quarter of the Northeast Quarter (NE $\frac{1}{4}$  of NE $\frac{1}{4}$ )  
of Section 5, Township 11 South, Range 10 West, thence South 163.87  
feet, thence West 1326.9 feet, thence North 163.87 feet, thence  
East 1326.9 feet to the point of commencement, together with all  
additions and improvements situated thereon.

1655328  
C. W. Beck

Taxes for the year 1979 are paid. Taxes for the year 1980 are assumed by the Buyer.

All parties signing the within instrument have declared themselves to be of full legal capacity.

All agreements and stipulations herein, and all the obligations herein assumed shall inure to the benefit of and be binding upon the heirs, successors, and assigns of the respective parties, and the Buyer, its heirs and assigns shall have and hold the described property in full ownership forever.

The certificate of mortgages by Article 3364 of the Revised Civil Code of Louisiana is dispensed with by the parties.

THUS DONE AND SIGNED in the City of Lake Charles, Parish of Calcasieu, State of Louisiana, in the presence of me, Notary, and the following competent witnesses who have signed in the presence of the parties and me, Notary, on this 24th day of November, 1980, after reading of the whole.

WITNESSES:

Patricia A. Louailier  
Patricia A. Louailier

Malcolm Paul Richard  
MALCOLM PAUL RICHARD

Cynthia Ann Benoit  
Cynthia Ann Benoit

Joan Reich Richard  
JOAN REICH RICHARD

Henry R. Liles  
NOTARY PUBLIC  
HENRY R. LILES

THUS DONE AND SIGNED in the City of Lockport, County of Will, State of ILLINOIS, in the presence of me, Notary, and the following competent witnesses who have signed in the presence of the parties and me, Notary, on this 12th day of NOVEMBER, 1980, after reading of the whole.

WITNESSES:

Therese A. Blaud  
Therese A. Blaud

CHEMICAL WASTE MANAGEMENT, INC.  
BY: Lawrence Beck  
LAWRENCE BECK, Senior Vice-President

Judith L. Van Ness  
NOTARY PUBLIC

MY COMMISSION EXPIRES: 12/19/82

(SEAL)

000667

CHEMICAL WASTE MANAGEMENT, INC.

RESOLUTION AUTHORIZING PURCHASE OF REAL ESTATE

Upon motion duly made, seconded and adopted,

IT WAS RESOLVED THAT: Lawrence Beck, Senior Vice-President of the corporation, be and he is hereby authorized to purchase the following described immovable property from Malcolm Paul Richard and Joan Reich Richard, for the total purchase price of \$70,000.00, for and on behalf of this corporation, said property being situated in the Parish of Calcasieu, State of Louisiana, to-wit:

Commencing at a point 656.42 feet South of the Northeast Corner of the Northeast Quarter of the Northeast Quarter (NE $\frac{1}{4}$  of NE $\frac{1}{4}$ ) of Section 5, Township 11 South, Range 10 West, thence South 163.87 feet, thence West 1326.9 feet, thence North 163.87 feet, thence East 1326.9 feet to the point of commencement, together with all additions and improvements situated thereon.

The said Lawrence Beck, the Senior Vice-President of the corporation, be and he is hereby specially authorized and empowered to make, sign and execute for and on behalf of this corporation any and all acts and instruments of writing covering said transactions; to incur and pay all expenses necessary and requisite in the premises, and to do and perform all and every other act, matter and thing whatsoever as shall or may be requisite and necessary in the consummation thereof.

\*\*\*\*\*

I HEREBY CERTIFY that the above and foregoing resolution is a true and correct extract copy of the minutes of a meeting of the Board of Directors of Chemical Waste Management, Inc., duly called and convened at the domicile of this corporation, on the 10TH day of NOVEMBER, 1980, where at a quorum was present.

Oak Brook Illinois on this 18th day of November, 1980.

ASST. SECRETARY

# CONVEYANCE

000668  
1630359

OFFICE OF CLERK OF COURT

CASH SALE NOV 26 2 46 PM '88

WILSON ABSHIRE, JR., ET UX :  
TO :  
CHEMICAL WASTE MANAGEMENT, INC. :

CALCASIEU PARISH, LOUISIANA  
UNITED STATES OF AMERICA  
STATE OF LOUISIANA  
PARISH OF CALCASIEU

BEFORE US, the undersigned authorities, in and for the states, counties and/or parishes hereinafter shown, and on the dates indicated, personally came and appeared:

WILSON ABSHIRE, JR., of lawful age and a resident of the Parish of Calcasieu, State of Louisiana, married to and residing with Ethlyn Richard Abshire, born Richard, and the said

ETHLYN RICHARD ABSHIRE, born Richard,

herein called SELLERS, residents of and domiciled in Sulphur, the Parish and State aforesaid, whose permanent mailing address is declared to be Route 2, Box 1940, Sulphur, Louisiana, 70663, who declared that for the price of FIFTY THOUSAND AND NO/100 (\$50,000.00) DOLLARS cash, receipt of which is acknowledged, SELLERS hereby sell and deliver with full warranty of title and subrogation to all rights and actions of warranty SELLERS may have, unto:

CHEMICAL WASTE MANAGEMENT, INC., a Delaware corporation, authorized to do business in the Parish of Calcasieu, State of Louisiana, herein represented by its duly authorized Senior Vice-President, Lawrence Beck

herein called BUYER,

whose permanent mailing address is declared to be 900 Jorie Boulevard, Oak Brook, Illinois, 60521, the following described property the possession and delivery of which BUYER acknowledges, said property being situated in the Parish of Calcasieu, State of Louisiana, to-wit:

Commencing at a point 820.29 feet South of the Northeast Corner of the Northeast Quarter of the Northeast Quarter (NE $\frac{1}{4}$  of NE $\frac{1}{4}$ ) of Section 5, Township 11 South, Range 10 West, thence West 1326.9 feet, thence South 163.87 feet, thence East 1326.9 feet, thence North 163.87 feet to the point of commencement, together with all additions and improvements situated thereon.



000669

Taxes for the year 1979 are paid. Taxes for the year 1980 are assumed by the Buyer.

All parties signing the within instrument have declared themselves to be of full legal capacity.

All agreements and stipulations herein, and all the obligations herein assumed shall inure to the benefit of and be binding upon the heirs, successors, and assigns of the respective parties, and the Buyer, its heirs and assigns shall have and hold the described property in full ownership forever.

The certificate of mortgages by Article 3364 of the Revised Civil Code of Louisiana is dispensed with by the parties.

THUS DONE AND SIGNED in the City of Lake Charles, Parish of Calcasieu, State of Louisiana, in the presence of me, Notary, and the following competent witnesses who have signed in the presence of the parties and me, Notary, on this 24th day of November, 1980, after reading of the whole.

WITNESSES:

Patricia A. Louaillier  
Patricia A. Louaillier

Wilson Abshire, Jr.  
WILSON ABSHIRE, JR.

Cynthia Ann Benoit  
Cynthia Ann Benoit

Ethelyn Richard Abshire  
ETHLYN RICHARD ABSHIRE

Henry R. Giles  
NOTARY PUBLIC  
HENRY R. GILES

THUS DONE AND SIGNED in the City of Lockport, County of Will, State of ILLINOIS, in the presence of me, Notary, and the following competent witnesses who have signed in the presence of the parties and me, Notary, on this 12th day of NOVEMBER, 1980, after reading of the whole.

WITNESSES:

James H. Bland  
James H. Bland

CHEMICAL WASTE MANAGEMENT, INC.

BY: Lawrence Beck  
LAWRENCE BECK, Senior  
Vice-President

Judith L. Ventresca  
NOTARY PUBLIC

MY COMMISSION EXPIRES:

12/19/83

(SEAL)

000670

CHEMICAL WASTE MANAGEMENT, INC.

RESOLUTION AUTHORIZING PURCHASE OF REAL ESTATE

Upon motion duly made, seconded and adopted,

IT WAS RESOLVED THAT: Lawrence Beck, Senior Vice-President of the corporation, be and he is hereby authorized to purchase the following described immovable property from Wilson Abshire, Jr. and Ethlyn Richard Abshire, for the total purchase price of \$50,000.00, for and on behalf of this corporation, said property being situated in the Parish of Calcasieu, State of Louisiana, to-wit:

Commencing at a point 820.29 feet South of the Northeast Corner of the Northeast Quarter of the Northeast Quarter (NE $\frac{1}{4}$  of NE $\frac{1}{4}$ ) of Section 5, Township 11 South, Range 10 West, thence West 1326.9 feet, thence South 163.87 feet, thence East 1326.9 feet, thence North 163.87 feet to the point of commencement, together with all additions and improvements situated thereon.

The said Lawrence Beck, the Senior Vice-President of the corporation, be and he is hereby specially authorized and empowered to make, sign and execute for and on behalf of this corporation any and all acts and instruments of writing covering said transactions; to incur and pay all expenses necessary and requisite in the premises, and to do and perform all and every other act, matter and thing whatsoever as shall or may be requisite and necessary in the consummation thereof.

\*\*\*\*\*

I HEREBY CERTIFY that the above and foregoing resolution is a true and correct extract copy of the minutes of a meeting of the Board of Directors of Chemical Waste Management, Inc., duly called and convened at the domicile of this corporation, on the 10th day of NOVEMBER, 1980, where at a quorum was present.

Oak Brook, Illinois, on this 18th day of November, 1980.

WITNESS MY HAND AND SEAL OF OFFICE IN WISCONSIN  
ON THE 21ST DAY OF NOVEMBER, 1980

SECRETARY

*James R. Kohn*

000671

# Schwab & Walter

Attorneys at Law

John Schwab

Gerald L. Walter, Jr.

Athena B. Piedrahita

William E. Hodgkins

10636 Linkwood Court

Baton Rouge, Louisiana 70810

Telephone (504) 767-1460

October 24, 1983

Mr. Donald B. Howard  
Department of Natural Resources  
Hazardous Waste Division  
P. O. Box 44066  
Baton Rouge, Louisiana 70804

Mr. George Eldridge  
Legal Division  
Department of Natural Resources  
P. O. Box 44066  
Baton Rouge, Louisiana 70804

Gentlemen:

For your files, we are enclosing herewith a copy of the affidavit prepared and filed in accordance with Section 13.10 of the Hazardous Waste Management Plan Rules and Regulations. The affidavit was filed for record on the 19th day of October, 1983 and bears file number 1774865 and was recorded in conveyance record number 1772 page 87 of the records of the Clerk and Recorder for the Parish of Calcasieu, State of Louisiana. Also enclosed is a copy of the certificate of the Clerk concerning the recordation.

As discussed with both of you and with Mr. Winston Day, it would appear that an amendment to the Hazardous Waste Management Plan is in order since the notice requirement contemplated by Section 13.10 would occur at closure, not during the operating life of the facility.

With warm personal regards, we remain,

Very truly yours,

SCHWAB & WALTER



GERALD L. WALTER, JR.

GLW,jr:dc

Enclosures

cc: Ben Haney  
William V. Walls  
Norb Bolda  
Sheri Swibel

STATE OF LOUISIANA } FOURTEENTH JUDICIAL DISTRICT  
PARISH OF CALCASIEU } OFFICE OF THE CLERK OF COURT

I HEREBY CERTIFY, That the foregoing is a true and correct copy of the original

AFFIDAVIT

filed for record in this office OCT. 19, 19<sup>83</sup>, bearing File  
No. 1774865, and duly recorded on OCT. 20, 19<sup>83</sup>,  
1772 CONVEYANCES 87  
in Book of on page et seq.

IN TESTIMONY WHEREOF, witness my official signature and seal of office at

Lake Charles, Louisiana, on this the 20th day of

OCT. , A.D. 19 83

ACTON HILLEBRANDT, CLERK OF COURT

By Mona Fontenot  
Deputy Clerk of Court

STATE OF LOUISIANA

PARISH OF EAST BATON ROUGE

AFFIDAVIT

BEFORE ME, a Notary Public in and for the Parish of East Baton Rouge,  
State of Louisiana, personally came and appeared:

Chemical Waste Management, Inc., a foreign corporation authorized  
to do and doing business in the State of Louisiana appearing  
herein through its duly authorized agent and attorney, who after  
being duly sworn, did acknowledge and declare that:

Chemical Waste Management is the owner of a certain tract or parcel of  
ground described as follows:

A certain tract or parcel of ground containing approximately 280  
acres, located in Sections 8 and 9 of Township 11 South, Range 10  
West, located in the Parish of Calcasieu, State of Louisiana and  
which said tract is divided by John Brannon Road so that 160  
acres is west of John Brannon Road and 120 acres is east of John  
Brannon Road.

Chemical Waste Management, Inc., by this instrument, notifies any  
potential purchaser of the above described property that:

1. The foregoing property may be used to manage hazardous waste.
2. The aforesaid property may be subject to certain post-closure  
care and use requirements if used to manage hazardous waste.  
[Section 13.7 of the Hazardous Waste Management Plan Rules and  
Regulations of the State of Louisiana adopted July 20, 1983]
3. For any waste which may be disposed of upon said property an  
operational record of the type, location and quantity of  
hazardous waste disposed of within each cell or area of the  
facility is maintained at the facility.
4. Within the delays specified following closure of the facility,  
certain requirements of the hazardous waste management plan may  
be applicable to the property if the property is used to manage  
hazardous waste in accordance with the said Hazardous Waste  
Management Plan.

The foregoing affidavit has been placed in the Conveyance Records of the  
Parish of Calcasieu in accordance with Section 5.3.4 of the Hazardous Waste  
Management Plan Rules and Regulations of the State of Louisiana dated July 20,  
1983.

CHEMICAL WASTE MANAGEMENT, INC.

By: [Signature]  
Attorney

SWORN TO AND SUBSCRIBED before me this 18<sup>th</sup> day of October,  
1983.

[Signature]  
NOTARY PUBLIC